## **EXHIBIT 2**

UNITED STATES SOUTHERN DISTRICT SOUTHERN DISTRICT OF NEW YORK

-----X

GRAHAM CHASE ROBINSON,

Plaintiff,

-against- Case No:

1:19-cv-09156 (LTS) (KHP

ROBERT DE NIRO and CANAL PRODUCTIONS, INC.,

Defendants.

----X

DEPOSITION TAKEN VIA ZOOM

December 20, 2021 10:00 a.m.

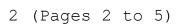
DEPOSITION of GRAHAM CHASE ROBINSON, the Plaintiff herein, taken by the Defendants, pursuant to Article 31 of the Civil Practice Law & Rules of Testimony, and Court Order, held at the above-mentioned time, before, PAIGE HAYDEN, a Court Reporter and Notary Public of the State of New York.

-----x

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	Page 2		Page 3
1	APPEARANCES:	1	FEDERAL STIPULATIONS:
2	SANFORD HEISLER SHARP, LLP	2	. DD DANIE CAN COMPANY
3	Attorneys for Plaintiff 1350 6th Avenue 31st floor	3	
3	New York, New York 10019	4	IT IS HEREBY STIPULATED AND AGREED BY AND BETWEEN THE
4	DV ALEVANDRA HARWRI EGO	5	ATTORNEYS FOR THE RESPECTIVE PARTIES HEREIN, THAT FILING
5	BY: ALEXANDRA HARWIN, ESQ.	6	AND SEALING BE AND THE SAME ARE HEREBY WAIVED.
6		7	AND SEALING DE AND THE SAME ARE HERED! WAIVED.
7	TRAUB LIEBERMAN Attorneys for Defendant	8	IT IS ELIDTHED STIDLILATED AND ACREED THAT ALL ODIECTIONS
8	Seven Skyline Drive	9	IT IS FURTHER STIPULATED AND AGREED THAT ALL OBJECTIONS,
	HAWTHORNE, NEW YORK 10532		EXCEPT AS TO FORM OF THE QUESTION, SHALL BE RESERVED TO
9	BY: GREGORY BENNETT, ESQ.	10	THE TIME OF THE TRIAL.
10	DI GLEGORI DE L'AZIT, 25Q	11	
11 12	TARTER KRINSKY & DROGIN LLP	12	IT IS FURTHER STIPULATED AND AGREED THAT THE WITHIN
12	Attorneys for Defendant	13	DEPOSITION MAY BE SWORN TO AND SIGNED BEFORE ANY OFFICER
13	1350 Broadway	14	AUTHORIZED TO ADMINISTER AN OATH, WITH THE SAME FORCE
14	New York, New York 10018	15	AND EFFECT AS IF SIGNED AND SWORN TO BEFORE THIS COURT.
11	BY: LAURENT DROGIN, ESQ.	16	
15		17	
16 17	ALSO PRESENT:	18	
18	KATE MACMULLIN, SANFORD HEISLER SHARP, LLP	19	
19	ANNIE SLOAN, SANFORD HEISLER SHARP, LLP	20	
20	DAVID SANFORD, SANFORD HEISLER SHARP, LLP	21	
	BRITTANY K. LAZZARO, TARTER KRINSKY & DROGIN LLP	22	
21 22	TOM HARVEY	23	
23		24	
24 25		25	
	Page 4		Page 5
1		1	G. C. ROBINSON
2	GRAHAM CHASE ROBINSON, the WITNESS	2	It is hereby stipulated
3	herein, having been first duly sworn by	3	and agreed that all
4	a Notary Public of the State of New	4	objections, except as to form
5	York, was examined and testified as	5	of the question, shall be
6	follows:	6	reserved to the time of the
7	EXAMINATION BY	7	trial.
8	MR. DROGIN:	8	It is hereby stipulated
a	Q. State your name for the	ا م	and agreed that the within
10	record, please.	10	deposition may be sworn to
11	A. Graham Chase Robinson.	11	and signed before any officer
12		12	authorized to administer an
13		13	
14	record, please.	14	oath, with the same force and
15	A.	15	effect as if signed and sworn
16	MP DPOCINI Paiga and	16	to before this Court.
17	MR. DROGIN: Paige, can	17	MR. DROGIN: I am
	you read into the record the		prepared to so stipulate.
18	Federal Stipulations?	18	MS. HARWIN: Yes, that is
19	THE COURT REPORTER: It	19	fine.
20	is hereby stipulated and	20	MR. BENNETT: As am I.
21	agreed by and between the	21	Just to put it on the record,
22	attorneys for the respective	22	we are obviously proceeding
23	parties herein, that filing	23	under the terms of the
24	and sealing be and the same	24	stipulation that the Court
25	are hereby waived.	25	has entered into with respect
20	3		1





		1			
		Page 6			Page 7
1	G. C. ROBINSON		1	G. C. ROBINSON	
2	to remote depositions.		2	And during the period of	
3	Q. Good morning, Chase.		3	time from when you were growing up,	
4	A. Good morning.		4	until now, has anyone else resided	
5	Q. How long have you lived at		5	with you on a more or less permanent	
6	the address where you are where		6	basis?	
7	you are currently at?		7	A. On a permanent basis, no.	
8	MS. HARWIN: Objection to		8	Q. Have you ever had your	
9	the form.		9	deposition taken before?	
10	MR. DROGIN: How would		10	A. No.	
11	you like me to rephrase it?		11	Q. Have you ever previously	
12	MS. HARWIN: Ask how long		12	attended a deposition either	
13	she lived at her residential		13	remotely or in person?	
14	address?		14	A. No.	
15	MR. DROGIN: I will adopt		15	Q. Alright.	
16	your attorney's question.		16	So the way that we are	
17	A. This is my family home that		17	going to proceed is just as you have	
18	I grew up in. I live with my		18	been doing. It is a	
19	mother.		19	question-and-answer format.	
20	Q. How long have you lived		20	It is very important that	
21	with your mother?		21	you listen to the whole question.	
22	A. I can't recall how many		22	Often you may be able to anticipate	
23	years I have lived with her. This		23	where I am going, and sometimes you	
24	is my childhood home so		24	may be right, sometimes you may be	
25	Q. Okay.		25	wrong. But to ensure that you are	
2.5	Q. Onay.		20	wrong. But to ensure that you are	
		Page 8			Page 9
1	G. C. ROBINSON	Page 8	1	G. C. ROBINSON	Page 9
1 2	G. C. ROBINSON truly and actually answering the	Page 8	1 2		Page 9
		Page 8		G. C. ROBINSON	Page 9
2 3 4	truly and actually answering the	Page 8	2 3 4	G. C. ROBINSON Is that understood? MS. HARWIN: Objection. It is not her job to rephrase	Page 9
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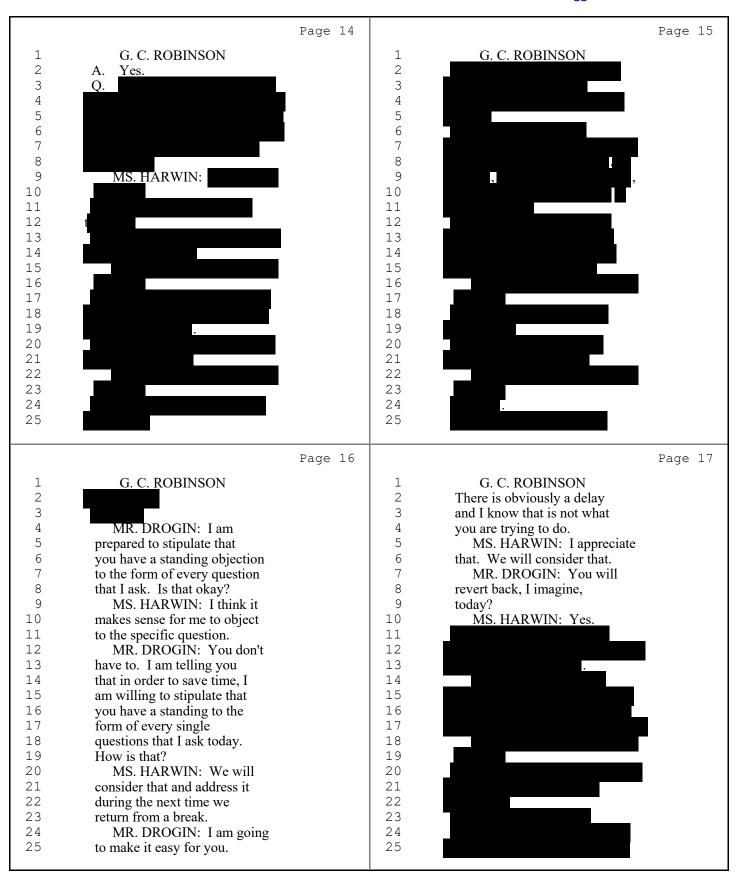


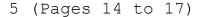


	D 1		D 11
	Page 1	U	Page 11
1	G. C. ROBINSON	1	G. C. ROBINSON
2	MR. DROGIN: Okay.	2	are under some time restraint, I
3	Q. If there is a word that you	3	would rather get right answers than
4	don't understand, will you tell me?	4	quick answers that you might want to
5	MS. HARWIN: Objection to	5	change later.
6	the form.	6	Do you agree to answer to
7	Q. You can answer.	7	the best of your ability?
8	A. Yes, I will try to.	8	A. Yes.
9	Q. Alright.	9	Q. We are going to be talking
10	If you need me to repeat	10	about events that happened, on many
11	the question, just let me know, and	11	occasions, many years ago. It is
12	either I will or I will ask the	12	perfectly alright to tell me if you
13	court reporter to read it back.	13	don't know or you don't remember.
14	Is that okay?	14	Is that understood?
15	A. Yes.	15	A. Yes.
16	Q. If you answer the question	16	Q. It is important that you
17	that I have asked, I am going to	17	don't guess.
18	make the assumption that you heard	18	Is that understood?
19	the question, you understood the	19	A. Yes.
20	question, and you are answering that	20	Q. So when you answer a
21	question.	21	question, I am going to assume that
22	Is that understood?	22	you answer to the full extent and
23	A. Yes.	23	
24		24	best of your ability.  Is that understood?
25	Q. Please take your time in	25	A. That is understood.
23	answering my questions. While we	23	A. That is understood.
	Page 1	2	Page 13
1	G. C. ROBINSON	1	G. C. ROBINSON
2	Q. Are you currently alone	2	Q. Okay.
3	where you are right now?	3	Are you currently under any
4	A. Yes.	4	medications that would impair your
5	Q. Do you understand that	5	ability to answer my questions?
6	during this deposition while you are	6	A. No, not that I am aware of.
7	being questioned no else is to be	7	Q. And before we began, you
8	present?	8	raised your right hand and you swore
9	A. Yes.	9	to tell the truth. Correct?
10	Q. And do you understand that	10	A. Yes.
11	while you are being questioned, you	11	Q. What does that oath mean to
12	are not to have any communications	12	you?
13	with anyone either by text, or	13	MS. HARWIN: Objection to
14	e-mail, or other means of electronic	14	the form.
15	communication?	15	Q. Does that oath have a
16	A. Yes.	16	meaning to you?
17	Q. Is there any reason why you	17	MS. HARWIN: Objection to
18	can't proceed under the instructions	18	the form.
19	that we have just been discussing	19	A. The oath means to tell the
20	for the past few minutes?	20	truth.
21	A. Not that I am aware of.	21	Q. Will you agree to tell the
22	Q. Are you currently taking	22	truth, even if the answer may be
	any medication that would impair	23	
. / <	any inculcation that would iiibaif	43	damaging to your case?
23		27	MC HADWIN. Objection to
23 24 25	your ability to hear my questions?  A. No, not that I am aware of.	24 25	MS. HARWIN: Objection to the form.

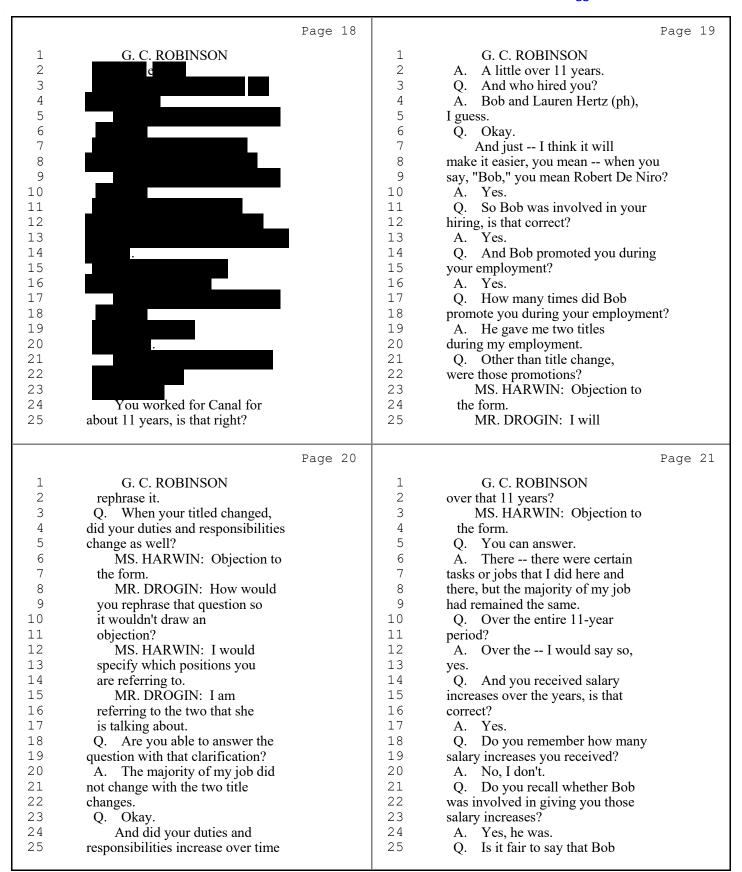
4 (Pages 10 to 13)











6 (Pages 18 to 21)



	Page 22		Page 23
1	G. C. ROBINSON	1	G. C. ROBINSON
2	came to rely on you to handle many	2	MS. HARWIN: Objection to
3	things about his life?	3	the form.
4	MS. HARWIN: Objection to	4	A. I believe that is a core
5	the form.	5	job of all Canal employees.
6	Q. When she objects to the	6	Q. What is?
7	form, you can answer it.	7	A. To do what Bob asked.
8	A. I think that there are I	8	Q. Okay.
9	think there were, like many	9	And again, I am going to
10	employees, things that Bob had asked	10	come back to my question.
11	many of the things he had asked	11	Does that mean that he
12	me had to do with his potential	12	relied on you to do what he asked?
13	life, his domestic life, items that	13	MS. HARWIN: Objection to
14	were personal in nature or items	14	the form.
15	that dealt with his ex-girlfriend,	15	A. I believe he relied on me
16	Toukie Smith or his kids.	16	as he did other employees to do what
17	Q. Okay.	17	he asked.
18	I am going to come back to	18	Q. As time went on, as you
19	my question.	19	indicated, you learned a great deal
20	In performing your duties	20	about his personal life, is that
21	for Canal, however, is it fair to	21	correct?
22	say that he would rely on you, in	22	MS. HARWIN: Objection to
23	your role as a Canal employee, to do	23	the form.
24	certain things for him and the	24	A. Like many employees, yes, I
25	company?	25	did.
	Company.		ord.
	Page 24		Page 25
1	Page 24 G. C. ROBINSON	1	Page 25 G. C. ROBINSON
2		2	-
	G. C. ROBINSON	2 3	G. C. ROBINSON
2 3 4	G. C. ROBINSON Q. So is it fair to say over	2 3 4	G. C. ROBINSON things that may make him happy or
2 3	G. C. ROBINSON Q. So is it fair to say over time you came to know his likes and	2 3	G. C. ROBINSON things that may make him happy or upset him?
2 3 4	G. C. ROBINSON Q. So is it fair to say over time you came to know his likes and dislikes?	2 3 4	G. C. ROBINSON things that may make him happy or upset him? A. Can you repeat the
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1	G. C. ROBINSON	1	G. C. ROBINSON	
2	Q. You can answer unless you	2	MS. HARWIN: Objection to	
3	don't understand the question. You	3	the form.	
4	told me that you would tell me if	4	A. I became aware of	
5	you don't understand the question,	5	information like other Canal	
6	right? You will tell me if you	6	employees that was not common	
7	don't understand the question, is	7	knowledge or in public.	
8	that fair?	8	Q. So for example, health	
9	A. Yes, I said I would try.	9	issues that he had, correct, that is	
10	MR. DROGIN: I will	10	one thing?	
11	rephrase the question.	11	MS. HARWIN: Objection to	
12	Q. Over time, is it fair to	12	the form.	
13	say that you learned how to read his	13	A. Yes, I believe there were	
14	mood?	14	some that weren't	
15 16	MS. HARWIN: Objection to the form.	15 16	Q. And you became privy to certain marital issues that he was	
17	the form.  A. I think at times you could	17		
18	understand his mood. He was at	18	having over this 11-year period, is that fair?	
19	times quite verbal about his likes	19	A. Yes, some of the ones that	
20	and dislikes.	20	weren't public. Others that were.	
21	Q. And you is it fair to	21	Q. Is it also fair to say that	
22	say that you knew a great deal about	22	there were ups and downs in your	
23	not a great deal of nonpublic	23	relationship with Bob?	
24	information about him, is that	24	MS. HARWIN: Objection to	
25	correct?	25	the form.	
	Page 28			Page 29
1	Page 28 G. C. ROBINSON	1	G. C. ROBINSON	Page 29
1 2		1 2	times to offset other thoughts of	Page 29
2 3	G. C. ROBINSON A. I think that there were times that he was incredibly abusive	2 3		Page 29
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Page 34	Page 35
1 G. C. ROBINSON 2 MR. DROGIN: Ms. Harwin, 3 I offered you a stipulation 4 where you could have a 5 standing objection to the 6 form for every single 7 question that I was asking. 8 MS. HARWIN: Yes, 9 Plaintiff will we will 10 stipulate that Plaintiff has 11 a standing objection to form 12 of all questions posed in the 13 deposition. 14 MR. DROGIN: And that is, 15 I mean, obviously for me. 16 When Mr. Bennett is 17 questioning, we will see how 18 he does and if his questions 19 draw so many objections. 20 MS. HARWIN: Plaintiff 21 stipulates that Plaintiff 22 the parties stipulate that 23 Plaintiff has a standing 24 objection to the form of all 25 questions posed by Mr. Drogin	1 G. C. ROBINSON 2 during the deposition. 3 Q. When Bob returned from 4 California, isn't is true that he 5 needed a place to live? 6 A. Yes. 7 Q. When was it he returned, 8 about, if you don't know the exact 9 date? 10 A. I don't recall. 11 Q. It was sometime before 12 November 20th, 2018? 13 A. Yes. 14 Q. Did he when he came 15 back, he was renting a house in the 16 Hamptons, isn't that right? 17 A. I can't recall. 18 Q. Okay. 19 Was there a time when he 20 was also living in a hotel? 21 A. Yes. 22 Q. Around what period of time 23 was that? 24 A. Around July, August, 25 September, October, November. He
25 questions posed by Wil. Diogin	25 September, October, November. The
Page 36	Page 37
G. C. ROBINSON  came back during the time that he  was  Q. And he would stay in a  hotel?  A. Yes.  Q. Are you familiar with a  property known as  A. Yes.  Q. What was  A. Yes.  Q. What was  A. Was  Bob's rental townhouse that he moved into.  G. When did he move in?  A. I can't recall when he  moved in. It was, I believe, end of  October, beginning of November.  Q. This being 2018?  A. Yes.  Q. Before he moved in, the  townhouse needed to be furnished, is  that correct?  A. Yes, all four stories.  Q. And it needed furniture for	all four stories, correct?  A. Yes.  Q. It needed rugs or flooring, is that right?  A. Yes.  Q. It needed artwork, correct?  A. Yes.  Q. And it needed other  necessities, even down to like  vacuum cleaners, is that right?  A. Yes.  Q. And am I correct that Canal  employees were used to assist in the furnishing of  A. Some employees were. Bob  had asked me to help him design it.  Q. When you say, "design it,"  what do you mean?  A. Figure out layouts for the  rooms, source fabrics, send him  options for all the different items  that one would put in a house,  whether it was plates, glasses,  fabric for couches, couches,

10 (Pages 34 to 37)



	Page 38		Page 39
1	G. C. ROBINSON	1	G. C. ROBINSON
1 2		1 2	
	antiques things, all along the lines		townhouse needed to be furnished.
3	of that.	3	Q. And after it was furnished,
4	Q. And which other Canal	4	did he move in?
5	employees assisted with the	5	A. I wouldn't characterize it
6	furnishing of	6	that way.
7	A. Sabrina Weeks-Britan and Lu	7	Q. Alright.
8	Lu White.	8	How would you characterize
9	Q. Who is Sabrina?	9	it?
10	A. Sabrina was Bob's one of	10	A. He moved in while it was
11	Bob's executive assistants.	11	still in process in the process
12	Q. And who was Lu Lu?	12	of furnishing.
13	A. Lu Lu White was an	13	Q. So while this was in
14	assistant was supposed to be an	14	process, did your duties and
15	assistant to me and the office, but	15	responsibilities relating to
16	her job surrounded more of the	16	continue?
17	apartment then.	17	A. Yes.
18	Q. And the apartment,	18	Q. Was that true for the other
19	when did that start?	19	Canal employees who were pitching
20	A. I believe the lease began	20	in?
21	on August 1st of 2018.	21	A. Some of them. Lu Lu White.
22	Q. And the best your best	22	Lu Lu White did.
23	recollection is he moved in around	23	Q. What about Sabrina?
24	the fall of 2018, is that right?	24	A. She only had, I believe, a
25	A. Yes. The four-story	25	little involvement in the beginning.
	Page 40		Page 41
1	G. C. ROBINSON	1	G. C. ROBINSON
2	Q. What about Michael Tasch,	2	involved in the furnishing, more in
3	T-A-S-C-H?	3	the maintenance of things that
4	A. Can you specify or rephrase	4	needed to be fixed.
5	on what you are asking?	5	Q. Was Lu Lu involved in the
6	Q. Sure.	6	maintenance of things that needed to
7	How, if at all, was Michael	7	be fixed, like Michael Kaplan?
8	Tasch involved with the operation to	8	A. No. More in the design and
9	get furnished for Bob?	9	the items other items for the
10	A. Other than paying some of	10	apartment.
11	the bills, or checks for the	11	Q. What about Sabrina?
12	furnishing, I can't recall how else	12	A. As I said, she only had a
13	he would have had involvement.	13	small role in the beginning.
14	Q. What about Tom Harvey?	14	Q. Okay.
15	A. (No verbal response.)	15	Were there any household or
16	Q. I'm sorry. Did you answer	16	domestic employees who assisted at
17	the question?	17	that time with
18	A. Tom Harvey had helped	18	A. There was only for
19	during the rental process and the	19	domestic employees, there was only a
20	lease, but in terms of the actual	20	housekeeper, but not with the design
21	furnishing I can't recall him having	21	of .
22		22	Q. But anybody else
23	Q. What about Michael Kaplan	23	forgetting the design, was the
24	(ph)?	24	housekeeper involved in some of the
25	A. Michael Kaplan was not	25	things that needed to be done to get

11 (Pages 38 to 41)



	Page 42		Page 43	3
1		1	_	ر
1 2	G. C. ROBINSON	1 2	G. C. ROBINSON	
3	it set up so he could move in?  A. The housekeeper cleaned.	3	A. I had made objections on multiple occasions of not wanting to	
4		4		
5	Q. Alright. Did Bob ask y <u>ou to a</u> ssist	5	be involved in the project. It was his domestic life, and it wasn't	
6	in this process with	6		
7	A. Yes. He specifically asked	7	any job under the title that went with the title VP of production and	
8	me to help him design and design it	8	finance.	
9	with him.	9	Q. So this was separate and	
10	Q. Did you agree?	10	apart what he was asking you to	
11	A. I objected to want to go	11	do was separate and apart from your	
12	work on it.	12	ordinary duty, is that right?	
13	Q. But eventually, not	13	A. It had nothing to do with	
14	withstanding your objection, you did	14	my duties as VP of production of	
15	do it, correct?	15	finance, but it was something that	
16	A. Yes, I had to.	16	he had redirected me to do instead	
17	Q. Did you do it as a favor to	17	of other work. It was he	
18	him?	18	prioritized it.	
19	A. No.	19	Q. Is it fair to say that that	
20	Q. Were you trying to help	20	increased your work load?	
21	him?	21	A. It became a majority of my	
22	A. I was asked to do it as one	22	work load.	
23	of my job duties.	23	Q. Who is Tiffany Chen (ph)?	
24	Q. And are you saying that you	24	A. The woman that	
25	did it against your will?	25	and now his,	
20	did it against your win.	23	and now mo,	
	Page 44		Page 45	5
1	Page 44 G. C. ROBINSON	1		5
	G. C. ROBINSON	1 2	G. C. ROBINSON	5
1 2 3	-	1 2 3	G. C. ROBINSON period of time when you considered	5
2	G. C. ROBINSON I believe, current girlfriend.	2	G. C. ROBINSON	5
2 3	G. C. ROBINSON I believe, current girlfriend. Q. When was the first time that you met Tiffany?	2 3	G. C. ROBINSON period of time when you considered her to be his girlfriend? A. I don't think I would	5
2 3 4	G. C. ROBINSON I believe, current girlfriend. Q. When was the first time that you met Tiffany? A. During the films of The	2 3 4	G. C. ROBINSON period of time when you considered her to be his girlfriend? A. I don't think I would characterize it that way.	5
2 3 4 5	G. C. ROBINSON I believe, current girlfriend. Q. When was the first time that you met Tiffany? A. During the films of The Intern, and I believe that was 2014.	2 3 4 5	G. C. ROBINSON period of time when you considered her to be his girlfriend? A. I don't think I would characterize it that way. Q. Okay.	5
2 3 4 5 6	G. C. ROBINSON I believe, current girlfriend. Q. When was the first time that you met Tiffany? A. During the films of The	2 3 4 5 6	G. C. ROBINSON period of time when you considered her to be his girlfriend? A. I don't think I would characterize it that way.	5
2 3 4 5 6 7	G. C. ROBINSON I believe, current girlfriend. Q. When was the first time that you met Tiffany? A. During the films of The Intern, and I believe that was 2014. Q. And to your knowledge, when	2 3 4 5 6 7	G. C. ROBINSON period of time when you considered her to be his girlfriend? A. I don't think I would characterize it that way. Q. Okay. How would you characterize it?	ō
2 3 4 5 6 7 8	G. C. ROBINSON I believe, current girlfriend. Q. When was the first time that you met Tiffany? A. During the films of The Intern, and I believe that was 2014. Q. And to your knowledge, when	2 3 4 5 6 7 8	G. C. ROBINSON period of time when you considered her to be his girlfriend? A. I don't think I would characterize it that way. Q. Okay. How would you characterize it?	ō
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2 3 4 5 6 7 8 9	G. C. ROBINSON I believe, current girlfriend. Q. When was the first time that you met Tiffany? A. During the films of The Intern, and I believe that was 2014. Q. And to your knowledge, when	2 3 4 5 6 7 8 9	G. C. ROBINSON period of time when you considered her to be his girlfriend? A. I don't think I would characterize it that way. Q. Okay. How would you characterize it?	ō
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12 (Pages 42 to 45)

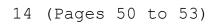


	Page 46		Page 47
1	G. C. ROBINSON	1	G. C. ROBINSON
2	, so I can't recall	2	testing being done to show there was
3	exactly when she I knew she was	3	no mold in right?
4	moving in.	4	A. There were tests that were
5	Q. I'm sorry, you did know she	5	done in , in 2019, that Michael
6	was moving in?	6	Tasch and Tom Harvey were involved
7	A. I can't recall when.	7	in as well.
8	Q. Okay.	8	Q. When Bob got back from
9	And she had, at one point,	9	California, do you recall him being
10	claimed there was a mold problem in	10	very uptight?
11	, is that right?	11	A. No, I don't recall that.
12	A. Yes.	12	Q. Had he been when he came
13	Q. And this was an issue that	13	back from California, was he
14	consumed a lot of your time, is that	14	screaming at you more regularly than
15	fair?	15	he had been in recent years?
16	A. It consumed a bit of my	16	A. In 2019, it had gotten
17	time, in addition to Tom Harvey and	17	his behavior and his berating had
18	Michael Tasch's as well.	18	gotten worse.
19	Q.	19	Q. This would have been after
20		20	he had announced
21	A	21	?
22	Q. She insisted there was mold	22	
23	in	23	I don't recall when they announced
24	A. Yes.	24	they were divorced.
25	Q. And there were all sorts of	25	Q. Did this also happen over
	Page 48		Page 49
1	Page 48 G. C. ROBINSON	1	Page 49 G. C. ROBINSON
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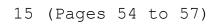


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1	G. C. ROBINSON	1	G. C. ROBINSON
2	A. I don't know.	2	audio recordings that you erased?
3	Q. Do you have any	3	A. Are you talking about
4	documentation that shows the dates	4	during my whole entire time at
5	and times that the recordings were	5	Canal, like a voicemail, or
6	<del></del>	6	
	made?		Q. No. Specifically I am
7	MS. HARWIN: I would just	7	talking in connection with the audio
8	note that obviously the	8	recordings, let's say that were made
9	Plaintiff is not to provide	9	in 2018 and 2019.
10	any attorney-client privilege	10	A. No.
11	information.	11	Q. No, there were none that
12	MR. DROGIN: So noted.	12	you erased?
13	A. Not that I am aware of.	13	A. Yes, that is correct.
14	Q. Okay.	14	Q. Did you destroy any audio
15	Do you have any other audio	15	recordings that you made during that
16	recordings that you have related to	16	time period?
17	your employment that you have not	17	A. No, not that I am aware of.
18	turned over to your attorney?	18	Q. Do you know how many hours
19	A. Not that I am aware of.	19	of recordings you turned over to
20	Q. Do you have any video	20	your attorney attorneys, roughly?
21	recordings that have not been turned	21	A. I don't know. I can't
22	over to your attorney that relate in	22	recall.
23	any way to your employment?	23	Q. During what period of time
24	A. Not that I am aware of.	24	were those recordings made?
25	Q. Did you have any other	25	A. I can't recall I can't
		+	
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1	Page 52 G. C. ROBINSON	1	Page 53 G. C. ROBINSON
	G. C. ROBINSON		
2	G. C. ROBINSON recall exactly when they began. I	2	G. C. ROBINSON townhouse.
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Page 54  1 G. C. ROBINSON 2 record. 3 Q. So that was on the iPhone 4 you recorded on speaker phone, is  Page 54  1 G. C. ROBINSON 2 MR. DROGIN: Sure. Give 3 me two minutes. 4 Q. And did you record all of	Page 55
2 record. 2 MR. DROGIN: Sure. Give 3 Q. So that was on the iPhone 3 me two minutes.	5 - 5
3 Q. So that was on the iPhone 3 me two minutes.	
· ·	
5 that what you said? 5 your calls with these Canal	
6 A. I recorded with the phone 6 employees or just some?	
7 on speaker phone, and recorded in on 7 A. I didn't record all of my	
8 an app on my computer that recorded 8 conversations with Canal employees.	
9 it. 9 Q. How did you go about	
10 Q. Alright. 10 deciding which ones to record and	
11 And were you always in New 11 which ones not to record?	
12 York when you recorded this these 12 A. I think that there were	
13 calls? 13 probably factors including what the	
14 A. I believe that I can't 14 topic was going to be, if it was	
15 recall. I believe I was in New 15 about the apartment. But I can't	
16 York. 16 recall any other decisions on why.	
17 Q. Okay. 17 Q. So am I correct that these	
18 Did you ever record any of 18 were all calls that you initiated as	
these calls when you were in Spain? 19 opposed to calls that you received?	
20 A. Yes, after I left Canal 20 A. I wouldn't say that that is	
21 Productions, I believe there was one 21 correct, but I can't recall whether	
in Spain. 22 somebody called me or I called them.	
23 MS. HARWIN: If there is 23 Q. Okay.	
24 a good time for a bathroom 24 Did you record any of these	
break, I would appreciate it. 25 calls while you were in California?	
Page 56	Page 57
1 G. C. ROBINSON 1 G. C. ROBINSON	
2 A. I can't recall a specific 2 you made, where you were recording	
3 a specific one that was in 3 people, you were actually being paid	
4 California. 4 by Canal, correct?	
5 Q. But you may have? 5 A. Yes. I mean yeah. That	
6 A. I don't know. I don't want 6 was part of discussing the work.	
7 to guess. 7 Q. At the time that you were	
8 Q. Okay. 8 recording these calls, had you told	
9 Does your iPhone store the 9 anyone that they were being	
10 location as where it is? 10 recorded?	
11 A. No. Not that I am aware 11 A. No, not that I believe.	
12 of. 12 Q. Is it a fair statement to	
13 Q. Alright. 13 say that to the best of your	
Some of the recordings that 14 recollection none of the people with	
you made were while you were still 15 whom you were speaking were aware	
you made were while you were still  you were speaking were aware employed, is that correct?  15 whom you were speaking were aware that you were recording their call?	
you made were while you were still  you made were while you were still  here aware  aware  that you were speaking were aware  that you were recording their call?  A. Yes.  A. I didn't discuss it with	
you made were while you were still  that you were speaking were aware  multiple speaking were aw	
you made were while you were still  that you were speaking were aware employed, is that correct?  A. Yes.  Q. And while you were making these recordings, was that working  15 whom you were speaking were aware that you were recording their call?  A. I didn't discuss it with any of them.  Q. Do you have any reason to	
you made were while you were still  15 whom you were speaking were aware  16 employed, is that correct?  17 A. Yes.  18 Q. And while you were making  19 these recordings, was that working  20 time?  15 whom you were speaking were aware  16 that you were recording their call?  A. I didn't discuss it with  any of them.  Q. Do you have any reason to believe that any of the people that	
you made were while you were still  15 whom you were speaking were aware that you were recording their call?  16 that you were recording their call?  17 A. Yes.  18 Q. And while you were making  19 these recordings, was that working  20 time?  21 A. Can you clarify? I mean, I  15 whom you were speaking were aware that a you were recording their call?  16 that you were recording their call?  A. I didn't discuss it with  any of them.  Q. Do you have any reason to believe that any of the people that you were recording were aware that a	
you made were while you were still  15 whom you were speaking were aware  16 employed, is that correct?  17 A. Yes.  18 Q. And while you were making  19 these recordings, was that working  20 time?  21 A. Can you clarify? I mean, I  22 was working.  15 whom you were speaking were aware  16 that you were recording their call?  A. I didn't discuss it with  any of them.  19 Q. Do you have any reason to  believe that any of the people that  you were recording were aware that a  you were recording were aware that a  recording was being made of your	
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1	Page 58		Page 59
1	G. C. ROBINSON	1	G. C. ROBINSON
2	Q. To the best of your	2	eight minutes.
3	recollection?	3	MR. DROGIN: So
4	A. I can't speculate what	4	stipulated.
5	somebody else thought.	5	(Whereupon, a recess was
6	Q. But as a general rule, you	6	taken at this time.)
7	didn't make people aware that they	7	Q. I want to make sure I
8	were being recorded, isn't that	8	understood your testimony. When you
9	right?	9	were making these recordings, are
10	A. Not that I am aware of.	10	you saying it was on an app on the
11	MR. DROGIN: This is a	11	computer, or an app on your phone?
12	good time for that break that	12	A. It is an app on my
13	you wanted.	13	computer. I think it is called
14	MS. HARWIN: Thank you	14	Voice.
15	very much. What time would	15	Q. Okay.
16 17	you like to come back on the	16	And when you say, "my
17	record?	17	computer," are you talking about a
18	MR. DROGIN: You tell me.	18	personal computer or a computer that
19	MS. HARWIN: Just five	19	you had through Canal?
20	minutes.	20 21	A. A personal computer.
21 22	MR. DROGIN: That means	22	Q. And that that
	ten, right?		information from your personal
23 24	MS. HARWIN: I will try	23 24	computer has not been turned over to
25	to keep it under ten. Why	25	your attorney or has it?  A. It has been.
23	don't we say 11:30? That is	25	A. It has been.
	Page 60		Page 61
1	G. C. ROBINSON	1	Page 61 G. C. ROBINSON
1 2		1 2	
	G. C. ROBINSON		G. C. ROBINSON
2 3 4	G. C. ROBINSON Q. Okay. Have you ever told Robin Chambers that you have recordings of	2 3 4	G. C. ROBINSON A. Can you give me an example or Q. If you stated an opinion,
2 3 4 5	G. C. ROBINSON Q. Okay. Have you ever told Robin Chambers that you have recordings of some of your calls with her?	2 3 4 5	G. C. ROBINSON  A. Can you give me an example or Q. If you stated an opinion, for example, like there was an old
2 3 4 5 6	G. C. ROBINSON Q. Okay. Have you ever told Robin Chambers that you have recordings of some of your calls with her? A. Not that I can recall.	2 3 4 5 6	G. C. ROBINSON  A. Can you give me an example or Q. If you stated an opinion, for example, like there was an old Bob and a new Bob. Is that
2 3 4 5 6 7	G. C. ROBINSON Q. Okay. Have you ever told Robin Chambers that you have recordings of some of your calls with her? A. Not that I can recall. Q. And when you were having	2 3 4 5 6 7	G. C. ROBINSON  A. Can you give me an example or Q. If you stated an opinion, for example, like there was an old Bob and a new Bob. Is that something that you said because you
2 3 4 5 6 7 8	G. C. ROBINSON Q. Okay. Have you ever told Robin Chambers that you have recordings of some of your calls with her? A. Not that I can recall. Q. And when you were having these conversations that you	2 3 4 5 6 7 8	G. C. ROBINSON  A. Can you give me an example or Q. If you stated an opinion, for example, like there was an old Bob and a new Bob. Is that something that you said because you believed it?
2 3 4 5 6 7 8	G. C. ROBINSON Q. Okay. Have you ever told Robin Chambers that you have recordings of some of your calls with her? A. Not that I can recall. Q. And when you were having	2 3 4 5 6 7 8 9	G. C. ROBINSON  A. Can you give me an example or Q. If you stated an opinion, for example, like there was an old Bob and a new Bob. Is that something that you said because you believed it?  A. If it is something that I
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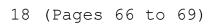


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1	G. C. ROBINSON	1	G. C. ROBINSON
2	A. Yes.	2	Q. Do you recall ever telling
3			Robin that when Bob returned from
	•	3	
4	A. Somebody that you confide	4	California he was in a "weakened
5	in.	5	state?"
6	Q. Did you confide in Robin?	6	A. I don't recall specifically
7	A. Yes.	7	saying that, but we had a lot of
8	Q. Would you agree that Robin	8	conversations.
9	was a confidant of yours?	9	Q. Alright.
10	A. I believe at times she was	10	When Bob returned from
11	the only person that I could speak	11	California, did you believe he was
12	to about the issues that I was	12	in a weakened state?
13	facing and receive advice from.	13	A.
14	When I was having issues or having	14	I think I would need to know
15	Bob berate me, I used to call her	15	the context of that conversation.
16	crying.	16	
17	Q. Did you value her advice?	17	
18	A. Yes.	18	Q. When he came back from
19	Q. Did you value her opinion?	19	, did you believe that his
20	A. At times, I did. Yes.	20	judgment was impaired because of
21	Q. Were there times that you	21	Tiffany?
22	didn't value her opinion?	22	A. Ĭ can't speculate on
23	A. I mean, I can't recall	23	whether his judgment was impaired by
24	every conversation or every piece of	24	Tiffany. His judgment was impaired.
25	opinion she gave me.	25	Q. I am asking, from your
	Page 64		Page 65
1		1	Page 65 G. C. ROBINSON
1 2	G. C. ROBINSON		G. C. ROBINSON
2	G. C. ROBINSON perception, did you believe his	2	G. C. ROBINSON Q. Now, you began to have
2 3	G. C. ROBINSON perception, did you believe his judgment was impaired or being	2 3	G. C. ROBINSON Q. Now, you began to have problems with Tiffany in 2018, is
2 3 4	G. C. ROBINSON perception, did you believe his judgment was impaired or being impaired by Tiffany?	2 3 4	G. C. ROBINSON Q. Now, you began to have problems with Tiffany in 2018, is that correct?
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2 3 4 5 6	G. C. ROBINSON perception, did you believe his judgment was impaired or being impaired by Tiffany? A. When he came back from , I don't know.	2 3 4 5 6	G. C. ROBINSON Q. Now, you began to have problems with Tiffany in 2018, is that correct? A. There were concerns in in 2018 and 2019. I felt that she
2 3 4 5 6 7	G. C. ROBINSON perception, did you believe his judgment was impaired or being impaired by Tiffany?  A. When he came back from , I don't know. Q. Was there subsequently a	2 3 4 5 6 7	G. C. ROBINSON Q. Now, you began to have problems with Tiffany in 2018, is that correct? A. There were concerns in in 2018 and 2019. I felt that she was really targeting me based on my
2 3 4 5 6 7 8	G. C. ROBINSON perception, did you believe his judgment was impaired or being impaired by Tiffany? A. When he came back from , I don't know. Q. Was there subsequently a point in time when you believe Bob's	2 3 4 5 6 7 8	G. C. ROBINSON Q. Now, you began to have problems with Tiffany in 2018, is that correct? A. There were concerns in in 2018 and 2019. I felt that she was really targeting me based on my gender, giving me demeaning jobs,
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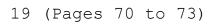


	Page 66		Page 67
1	G. C. ROBINSON	1	G. C. ROBINSON
2	They seemed to be concerning is how	2	my question, which is, when did this
3	I would probably phrase it	3	begin?
4	especially when it came to items	4	A. I felt some form of it in
5	that she was gifting me. A pack of	5	probably February. It wasn't until
6	massages and told me how the man or	6	probably about March where I really
7	the person there would massage me	7	felt that I was being targeted based
8	and what I had to wear. To me, it	8	on my gender, and based on items
9	was crossing of line of business.	9	that she wanted me to do at the
10	And she was trying to make it more	10	apartment that I had objected to.
11	personal, which was concerning. And	11	Q. Isn't it true that the
12	there were a lot of things that she	12	problems with Tiffany actually
13	was asking of me to help her	13	started in August of 2018?
14	facilitate in the apartment which	14	A. No, that would not be true.
15	were problematic.	15	And I am not quite sure I met her
16	Again, it wasn't part of my	16	until September. I can't recall
17	job as VP of production, but I found	17	when Bob had me come over and meet
18	myself doing a lot of housework the	18	her on a Saturday or Sunday.
19	party for the birthday and picking	19	Q. And in September or October
20	up items for her and Bob for the	20	of 2018, she sent you texts that you
21	home. Yeah.	21	were uncomfortable with, right?
22	Q. Let me know when you are	22	A. I believe they were
23	ready.	23 24	September/October. I didn't have
24 25	A. Yes.	25	much interaction with her in the
2.5	Q. I am going to come back to	23	beginning. It was I you know.
	Page 68		Page 69
1	Page 68 G. C. ROBINSON	1	Page 69 G. C. ROBINSON
2		2	
	G. C. ROBINSON	2 3	G. C. ROBINSON Q. And that made you feel uncomfortable?
2 3 4	G. C. ROBINSON Yeah. Q. Let's come back to my question.	2 3 4	G. C. ROBINSON Q. And that made you feel uncomfortable? A. It made me feel
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2 3 4 5 6	G. C. ROBINSON Yeah. Q. Let's come back to my question. So around September or October of 2018, she began sending	2 3 4 5 6	G. C. ROBINSON Q. And that made you feel uncomfortable? A. It made me feel uncomfortable in that there was something she was starting to
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2 3 4 5 6 7 8	G. C. ROBINSON Yeah. Q. Let's come back to my question. So around September or October of 2018, she began sending you texts that made you feel uncomfortable, is that right?	2 3 4 5 6 7 8	G. C. ROBINSON Q. And that made you feel uncomfortable? A. It made me feel uncomfortable in that there was something she was starting to
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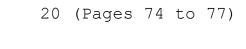


	Page 70		Page 71
1		1	-
1 2	G. C. ROBINSON	1	G. C. ROBINSON
3	you remember? A. She would demean and	2 3	something of something being
			uncomfortable that she was
4	denigrate the work that I did. At	4	perceiving something that wasn't
5 6	one point I had been asked by Bob to	5 6	wasn't there.
7	pick out a Christmas tree for for	7	Q. You just told us a story
	them and for the house. And I		about a Christmas tree. Obviously
8 9	picked one and she was quick to let	8 9	that was before February of 2019,
10	me know that when Bob came back from	10	correct? A. That was December. And
11	his trip he said, and I am quoting,	11	
12	"That tree is so fucking fat, let's	12	that was about her demeaning me and
13	just throw it out and get another	13	sort of letting me know that the
14	one." And she repeated that to me.	14	work that I had done the
15	I ended up having to get another	15	Christmas tree was needed to be
	Christmas tree for them. There were		replaced, and was just thrown out to
16 17	other comments made about setting me	16 17	get another one.
18	up with a guy that like a the	18	Q. So this was an unpleasant
	RTK worker. And that he and I would	19	interaction that you had with her
19 20	be good together. There were just a	20	before February of 2019, correct?  A. I wouldn't characterize it
21	lot of of comments that were	21	
22	concerning and just made me feel uncomfortable.	22	that way.
23	Q. Would you describe them as	23	Q. Okay.
24		24	How would you characterize it?
25	red flags?  A. I would describe them as	25	A. I wouldn't characterize it
2.5	A. I would describe them as	23	A. I wouldn't characterize it
	Page 72		Page 73
1	Page 72 G. C. ROBINSON	1	Page 73 G. C. ROBINSON
1 2		1 2	
	G. C. ROBINSON		G. C. ROBINSON
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	G. C. ROBINSON as unpleasant. It was just a comment that she had made to me, that I felt degraded me and put down the work that I was doing, specifically, for their domestic life. Q. The work being picking out a Christmas tree? A. Yes. And then being asked to decorate it by Bob. Q. There was a point in time where you gave Bob a hug and she was very upset. Do you remember that? A. I don't recall her I don't recall ever initiating a hug with Bob. And I don't recall a time where she was upset with me giving Bob a hug. I don't recall either of those. Q. Okay. Do you think she may have been jealous based on the fact that	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	G. C. ROBINSON relationship, and I am not suggesting there was anything physical ever between you. I am asking whether you thought she might be jealous?  A. It is something that Robin and I discussed, and I also discussed it with Michael Kaplan, Michael Tasch, and possibly Tom Harvey.  Q. Alright.  I am going to read a couple of words and I want you to tell me whether any of these accurately describe your opinion of Tiffany Chen during your employment. Okay? A. Yes. Q. Abusive? A. I don't know if I would use that word. Q. Psychotic? A. Yes, I think there were times that Michael Tasch or Robin,
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	G. C. ROBINSON as unpleasant. It was just a comment that she had made to me, that I felt degraded me and put down the work that I was doing, specifically, for their domestic life. Q. The work being picking out a Christmas tree? A. Yes. And then being asked to decorate it by Bob. Q. There was a point in time where you gave Bob a hug and she was very upset. Do you remember that? A. I don't recall her I don't recall ever initiating a hug with Bob. And I don't recall a time where she was upset with me giving Bob a hug. I don't recall either of those. Q. Okay. Do you think she may have	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	G. C. ROBINSON relationship, and I am not suggesting there was anything physical ever between you. I am asking whether you thought she might be jealous?  A. It is something that Robin and I discussed, and I also discussed it with Michael Kaplan, Michael Tasch, and possibly Tom Harvey.  Q. Alright.  I am going to read a couple of words and I want you to tell me whether any of these accurately describe your opinion of Tiffany Chen during your employment. Okay? A. Yes. Q. Abusive? A. I don't know if I would use that word. Q. Psychotic? A. Yes, I think there were





1 G. C. ROBINSON 2 Q. That is not my question. 3 And if we need to go back to abusive we can. 4 We can. 5 My question is, which of these words accurately describes for these words accurately describes for these words accurately describes for the course of your employment? 5 A. Okay, 6 A. Okay, 10 Q. Abusive? 11 A. I don't believe I would use that word. 12 Q. Psychotic? 13 Q. Psychotic? 14 A. I think at times in certain this intuitions, think at times in certain answer. 15 make sense. 16 Q. So does that mean the answer. 17 Q. So does that mean the answer. 18 answer. 19 A. Yes. 20 Q. Yes? 21 A. Yes. 22 Q. Okay. 22 Q. Okay. 23 Q. Okay. 24 A. Yes, I beheve that was. 25 Q. Suffers from Munchausen? 26 Q. So does that mean the answer. 27 A. I think at times. 28 Q. Suffers from Munchausen? 29 A. Yes. 20 Q. Yes? 21 A. Yes. 22 Q. Okay. 23 C. ROBINSON 24 A. Yes, I beheve that was. 25 Q. Suffers from Munchausen? 26 Q. So does that mean the answer. 27 A. Yes. 28 Q. Okay. 29 C. A. Yes. 29 Q. Okay. 20 Q. Yes? 20 Q. Okay. 21 G. C. ROBINSON 22 G. Okay. 23 C. Okay. 24 A. Yes, I beheve that was. 25 Q. Okay. 26 Q. Okay. 27 C. Okay. 28 C. ROBINSON 29 C. Mainpulative? 30 A. Yes. 31 A. Yes. 42 D. Drunk with power? 43 A. I think at times that would apply. 44 Q. I make times that would apply. 45 A. I think at times that would apply. 46 Q. I manuary, as well and continued a display. 47 A. I think at times that would apply. 48 A. Towards the end of my employment, the content of the house, the house being involved in the house, the house bei		Page 74		Page 75
2 Q. That is not my question. 3 And if we need to go back to abusive 4 we can. 4 My question is, which of 5 My question of Tiffiany Chen during 8 the course of your employment? 9 A. Okay. 10 Q. Abusive? 11 A. I don't believe I would use 12 that word. 12 Q. Psychotic? 13 Q. Psychotic? 14 A. I think at times in certain 15 situations, things didn't logically 16 make sense. 17 Q. So does that mean the 18 answer 19 A. Yes. 10 Q. Okay. 21 A. Yes. 22 Q. Qkay. 22 Q. Qkay. 23 A. Yes. 24 A. Yes, I believe that was. 25 Q. Suffers from Munchausen? 26 Q. Suffers from Munchausen? 27 A. Yes, I believe that was. 28 Q. Suffers from Munchausen? 29 A. At times. 40 Q. Drunk with power? 41 Q. Drunk with power? 42 A. At times. 43 Q. Manipulative? 44 A. I think at times. 45 Q. Manipulative? 46 Q. Mean? 47 A. I think at times that would apply. 48 Q. I mound like to talk now about how Tiffany made you feel. 49 A. I think at times that would apply. 40 Q. I mscurc? 41 A. Towards that end of my employment, I began to feel that the mad of the house. 49 Q. Drunk with poar feel. 40 Q. I mscurc? 41 A. Towards that end of my employment, I began to feel that the mad of the house. 40 Q. So it was at the end of my employment, I began to feel that the made of the mass and the made of the house. 41 A. Take that it mes and the made of the house. 42 A. Towards the end of my employment, I began to feel that the made of the house. 44 A. Tokick at the end of my employment, I began to feel that the made of the house. 45 A. Think at times that would apply. 46 A. Towards the end of my employment, I began to feel that the made of the house. 47 A. Towards the end of my employment, I began to feel that the made of the house. 48 A. Tokards the end of my employment, I began to feel that the made of the house. 49 A. Think at the end of my employment, I began to feel that the made of the house. 40 Danker that pour base of the made of the house. 41 A. Tokards that the end of my employment, I began to feel that the made of the made of the made of the house. 40 D	1		1	
And if we need to go back to abusive  4 we can  My question is, which of  6 these words accurately describes  7 your opinion of Tiffany Chen during  8 the course of your employment?  9 A. O'Ray,  10 Q. Abusive?  11 A. I don't believe I would use  11 that word.  12 that word.  13 Q. Psychotic?  14 A. I think at times in certain  15 situations, things didn't logically  16 make sense.  17 Q. So does that mean the  18 answer  19 A. Yes,  20 Q. Yes?  21 A. Yes.  22 Q. O'Kay.  23 A. Yes.  24 A. Yes, I believe that was.  25 Q. Suffers from Munchausen?  26 Q. Sociopah?  27 A. I think at times  6 Q. Mean?  7 A. I think at times  6 Q. Mean?  7 A. I think at times  6 Q. Mean?  7 A. I think at times  6 Q. Mean?  7 A. I think at times  8 Q. Mampulative?  9 A. I think at times  10 Q. I would like to talk now  11 d. I have a carefain point in that  12 d. I think at times that would  10 apply.  11 Q. Insecure?  12 A. Towards the end of my  13 mere that word one was a carefain point in the house, the  14 D. I would like to talk now  15 A. Towards the end of my  16 mere was - that that existed after  17 March probably March 27th, around  28 March bar vou began to get the  18 do Tom Harvey.  4 D. Irwa to the during that you believed that Tiffany suffered from Munchausen?  7 To Munchausen?  8 A. It was a conversation  9 between Tom Harvey.  4 A. I think at times in certain  14 think. If was a conversation  15 devened That Tiffany sufficed think of it, and I said  16 couldn't think of it, and I said  17 March probably March 27th, around  18 answer  19 Q. What is your understanding of Munchausen to be?  20 Okay.  21 A. Yes.  22 Q. Okay.  22 Q. Okay.  23 A. Yes.  24 Someone who acts sick and  25 Someone who acts sick and  26 C. ROBINSON  27 A. I think that there were  28 issues of me being more thank of the center of attention.  29 Dos on the bouse of the center of attention.  20 Dos on the bouse of the center of attention.  20 Dos on that what you are saying?  21 A. Yes.  22 Q. O'Kay.  23 A. Yes.  24 A. Yes.  25 Dos on the bei				
4 we can 5 My question is, which of 6 these words accurately describes 7 your opinion of Tillany Chen during 8 the course of your employment? 9 A. Okay. 9 A. Okay. 10 Q. Abusive? 11 A. I don't believe I would use 11 that word. 12 that word. 13 Q. Psychotic? 13 Q. Psychotic? 14 A. I think at times in certain 15 situations, things didn't logically 16 make sense. 17 Q. So does that mean the 18 answer 19 A. Yes. 20 Q. Yes? 21 A. Yes. 21 A. Yes. 22 Q. Okay. 22 Q. Okay. 22 Q. Okay. 23 A. Yes. 24 A. Yes. 25 Q. Suffers from Munchausen? 26 Q. Suffers from Munchausen? 27 A. I think at times 28 Q. Manipulative? 4 Q. Drunk with power? 4 Q. Manipulative? 9 A. I think at times 9 Q. Manipulative? 9 A. I think at times that would apply. 10 Q. Insecure? 11 Q. Insecure? 11 Q. Insecure? 12 A. I think at times that would apply. 13 apply. 14 Q. I would like to talk now 16 Q. Manipulative? 17 A. I think at times that would apply. 18 A. Towards the end of my 29 cmployment, I began to feel that there was - that that existed after 20 March probably March 27th, around 21 March probably March 27th, around 22 March probably March 27th, around 23 C. ROBINSON 24 March probably March 27th, around 25 C. Roben the end of my 26 C. Roben the end of my 27 cmployment, I began to feel that there was - that that existed after 28 draw farch at the end of my 29 cmployment, I began to feel that there was - that that existed after 29 draw farch at the end of my 20 cmployment, I began to feel that there was - that that existed after 29 draw farch at the end of my 20 cmployment, I began to feel that there was - that that existed after 20 draw farch at the end of my 21 cmployment, I began to feel that the word of the house that house? 24 draw farch probably March 27th, around 25 draw farch at the end of my 26 cmployment, I began to feel that the end of my 27 cmployment, I began to feel that the				
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6 these words accurately describes 7 your opinion of Tiflany Chem 8 the course of your employment? 8 the course of your employment? 9 A. Okay. 10 Q. Abusive? 11 A. I don't believe I would use 11 A. I don't believe I would use 11 A. I don't believe I would use 11 A. I think at times in certain 12 that word. 13 Q. Psychotic? 13 Q. Psychotic? 14 A. I think at times in certain 15 situations, things didn't logically 16 make sense. 16 answer - 19 A. Yes. 20 Q. Yes? 20 Q. Yes? 21 A. Yes. 21 A. Yes. 22 Q. Okay. 22 Q. Okay. 22 Q. Okay. 22 Q. Okay. 23 A. Yes. 24 A. Yes, I believe that was. 25 Q. Suffers from Munchausen? 26 Q. Suffers from Munchausen? 27 A. Yes. 28 Q. Drunk with power? 3 A. Yes. 4 Q. Drunk with power? 4 Q. Drunk with power? 4 Q. Drunk with power? 4 Q. Manipulative? 4 Q. Manipulative? 4 Q. Manipulative? 4 Q. Manipulative? 4 Q. I miscure? 4 Q. I miscure? 4 Q. I miscure? 5 A. I think at times that would apply. 4 Q. I mould like to talk now apply. 4 Q. I mould like to talk now apply. 5 A. I think at times that would apply. 6 A. I think at times that would apply. 7 A. I think at times that would apply. 8 Q. I miscure? 8 Q. Manipulative? 9 A. I think at times that would apply. 10 Q. Insecure? 11 A. I don't believe that would apply. 11 Q. Insecure? 12 A. I think at times that would apply. 13 apply. 14 Q. I would like to talk now apply. 15 A. To think at times that would apply. 16 A. To correct that you felt the was - that that existed after applied the house, the house being involved in the house, the house being warn to be in volved in the house. 16 Chambers, that it was made clear to you that she didn't warn you involved in the house. 17 Chambers, that it was made clear to you have any recollection of telling Robin Chambers, that it was made clear to you have any recollection of telling Robin Chambers, that it was made clear to you have any recollection of telling Robin Chambers, that it was made clear to you that she didn't want you involved in the house. 16 A. To think at times that existed after you have an				
## the course of your employment?  ## the course of your employment?  ## A. I don't believe I would use  ## as something when he was discussing her mentally. And he couldn't think of it, and I said  ## A. I dhink at times in certain  ## A. I don't believe I would use  ## A. I don't believe I would use  ## as something when he was discussing her mentally. And he couldn't think of it, and I said  ## A. I don't believe I would use  ## as something when he was discussing her mentally. And he couldn't think of it, and I said  ## A. I don't believe I was said that she has something when he was discussing her mentally. And he couldn't think of it, and I said  ## A. I don't believe I was said that she has something when he was discussing her mentally. And he couldn't think of it, and I said  ## A. I don't believe I don't believe I was said that she has something when he was discussing her mentally. And he couldn't think of it, and I said  ## A. I don't believe I don't believe I don't have said that she has something when he was discussing her mentally. And he couldn't think of it, and I said that she has something when he was discussing her mentally. And he couldn't think of it, and I said that she dis so't Munchausen?  ## A. I don't believe I don't think did in the read of it was a tower and the was did not want to be desired in the house had a did not want to be definition of Munchausen to be?  ## A. Yes.  ## A. Yes.  ## A. Yes.  ## Bage 76  ## A. Yes.  ## Bage 77  ## A. Yes.  ## Bage 77  ## A. I din't believe I don't have a couldn't think of it, and I said that she day of the here were a south of it, and I said the has something the was did not want to want				
8 the course of your employment? 9 A. Okay. 10 Q. Abusive? 11 A. I don't believe I would use 11 A. I don't believe I would use 12 that word. 12 that word. 13 Q. Psychotic? 14 A. I think at times in certain 15 situations, things didn't logically 16 make sense. 16 make sense. 17 Q. So does that mean the 18 answer - 18 situation or - I can't recall the 19 A. Yes. 20 Q. Yes? 20 Q. Yes? 21 A. Yes. 22 Q. Okay. 22 wants to be the center of attention. 23 A. Yes, 1 believe that was. 24 A. Yes, 1 believe that was. 25 Q. Suffers from Munchausen? 26 Q. Drunk with power? 27 A. I think at times the 28 Q. Manipulative? 3 A. A think at times. 4 Q. Manipulative? 4 Q. Manipulative? 5 A. I think at times that would apply. 5 A. I think at times that would apply. 5 A. I think at times that would apply. 5 A. I think at times that would apply. 5 A. I think at times that would apply. 5 A. I think at times that would apply. 5 A. I think at times that would apply. 5 A. I think at times that would apply. 5 A. I think at times that would apply. 5 A. I think at times that would apply. 5 A. I think at times that would apply. 5 A. I think at times that would apply. 5 A. I think at times that would apply. 5 A. I think at times that would apply. 5 A. I think at times that would apply. 5 A. I think at times that would apply. 5 A. I think at times that would apply. 5 A. I think at times that would apply. 5 A. I think at times that would apply. 5 A. I think at times that would apply. 5 A. I think at times that would apply. 5 A. I think at times that would apply. 5 A. I think at times that would apply. 5 A. I think at times that would apply. 5 A. I think at times that would apply. 5 A. I think at times that would apply. 5 C. CROBINSON 5 C. CROBINSON 5 C. CROBINSON 6 C. CROBINSON 7 C. CROBINSON 8 C. CROBINSON 9 C. CROBINSON 9 C. CROBINSON 9 C. CROBINSON 1 C				
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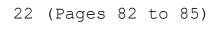


	Page 78		Page 79
1		1	
1	G. C. ROBINSON	1	G. C. ROBINSON
2	is not based on Tiffany specifically	2	other female executive assistants,
3	saying to me I don't want you being	3	and it was something that I voiced
4	involved in the house. It is a	4	concern with both Robin and Michael
5	feeling of that she wanted to handle	5	Tasch about.
6	the house. But I was still being	6	MR. DROGIN: Can you read
7	asked to do the house work and help	7	back my question?
8	with the domestic life by Bob, who	8	(Whereupon, the requested
9	specifically requested that I do	9	portion was read back by the
10	specific things.	1.0	reporter:
11	Q. Was Tiffany out for you?	11	Q: Did you feel that she
12	A. I felt targeted by her, but	12	was out, or to use your word,
13	out for me maybe towards I felt	13	targeting others?)
14	that way maybe towards the last week	14	A. As I said, I was concerned
15	of my employment.	15	about her possibly targeting other
16	Q. Did you feel that she	16	female executive assistants.
17	that she was a threat to your	17	Q. And did she target other
18	employment?	18	female executive assistants?
19	A. Not to my employment until	19	A. Not that I am aware of.
20	the very end of my employment.	20	This is at the tail end of my
21	Q. Did you feel that she was	21	employment with Canal.
22	out, or to use your word, targeting	22	Q. Did she target Tom Harvey?
23	others?	23	A. Not that I am aware of.
24	A. During my employment I was	24	Q. Did she target Michael
25	concerned that she might target	25	Tasch?
	<u> </u>		
	Page 80		Page 81
1	Page 80 G. C. ROBINSON	1	Page 81 G. C. ROBINSON
1 2		1 2	G. C. ROBINSON
	G. C. ROBINSON A. I don't know if she had	2	G. C. ROBINSON understanding of the labor law and
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1	G. C. ROBINSON	1	G. C. ROBINSON
2	maintenance guy. And she wanted it	2	A. He handled some of the
3	done, so she ended up doing it. I	3	maintenance at Bob's other
4	think she was upset that Michael	4	properties, such as, 110 Hudson
5	Kaplan told her that he couldn't be	5	Street, Bob's gym apartment, in
6	there because he had other work.	6	addition to Bob's fathers' art
7	Q. Did Michael <u>Kaplan</u> have to	7	studio.
8	do with anything at	8	Q. I am confining my question
9	A. He did some of the	9	to because that is what you
10	maintenance and wait for delivery.	10	have described that you were you
11	He also dealt with the Robert De	11	were brought in on. What other
12	Niro, Sr., paintings.	12	duties and responsibilities, if any,
13	Q. Anything else that you	13	did he have towards
14	recall?	14	A. He handled the security
15	A. A washer and dryer that	15	cameras.
16	needed to be put in, and technology,	16	Q. And my question is, these
17	TVs, Internet. He helped Dan Harvey	17	things that he was being asked to do
18	with the gym.	18	at , was that part of his
19	Q. Anything else that you can	19	regular job or was this in addition
20	recall?	20	to his regular Canal job?
21	A. Not that I can recall at	21	A. They were things that Bob
22	this moment.	22	had asked him to do.
23	Q. From your understanding,	23	Q. Right. But they were in
24	were those things part of Michael	24	line with his regular Canal job or
25	Kaplan's job?	25	were these like with you, additional
	Page 84		Page 85
1		1	_
1 2	G. C. ROBINSON	1 2	G. C. ROBINSON
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2 3 4 5	G. C. ROBINSON things that you were made to do? A. I don't know if you would call it additional. I think that they the core responsibility the core material duties at Canal	2 3 4	G. C. ROBINSON say is that I don't believe these were additional duties. I think that the job, as we all function as executive assistants, regardless of title were to do what Bob asked.
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1 G. C. ROBINSON		1	G. C. ROBINSON		
2 people at Canal were also used for		2	redirected my role and job to		
handling Bob's personal affairs?		3	prioritize and solely work on these		
4 A. The female executive		4	specific the domestic house,		
5 assistants handled more centered on		5	helping Toukie Smith with her needs		
6 typically female-gendered roles.		6	and her helping Bob		
7 Helping Bob with kid's schedules,		7	with his divorce, things of personal		
8 same with me, picking out I		8	nature.		
9 picked out presents at Christmas		9	Q. Okay.		
time, went shopping with him,		10	And this was redirected		
created photo albums for his		11	starting March of 2019, is that		
anniversary, things for his kid's		12	right?		
birthday, handled his prescriptions,		13	A. No. It was a conversation		
14 medications, supplements. There		14	that I had in September late		
15 were		15	September, beginning of October,		
16 Q. This is for throughout the		16	when I objected to working on this		
17 entire 11 years, is that right? 18 A. Yes.		17 18	these items. And he had		
		18 19	redirected my job.		
Q. But the change in 20 2018/2019, is it additional		20	Q. Okay. With regard to wasn't		
20 2018/2019, is it additional responsibilities, those related to		21	Tiffany running the show, not Bob?		
22 responsibilities, those related to 22 , correct?		22	A. I wouldn't characterize it		
23 A. I don't think you would		23	that way. Bob was making the		
24 characterize it, as I said,		24	decisions on the house and the		
25 additional responsibilities. Bob		25	contents of the house.		
additional responsionities. Boo		23	contents of the nouse.		
1	Page 88			Page	89
1 C. C. POPPIGON					
G. C. ROBINSON	ı	1	G. C. ROBINSON		
1 G. C. ROBINSON 2 O. Okav.		1 2	G. C. ROBINSON O. Isn't it true that you		
2 Q. Okay.		2	Q. Isn't it true that you		
Q. Okay. But I am coming back to		2	Q. Isn't it true that you didn't want to be involved in a		
Q. Okay.  But I am coming back to something that you said to Robin,		2 3 4	Q. Isn't it true that you didn't want to be involved in a triangle between Bob and Tiffany,		
2 Q. Okay. 3 But I am coming back to 4 something that you said to Robin,		2	Q. Isn't it true that you didn't want to be involved in a triangle between Bob and Tiffany, and that you were pulling away from		
Q. Okay.  But I am coming back to  something that you said to Robin, that Tiffany was quote, "running the		2 3 4 5	Q. Isn't it true that you didn't want to be involved in a triangle between Bob and Tiffany,		
Q. Okay. But I am coming back to something that you said to Robin, that Tiffany was quote, "running the show." Do you not stand by that comment?		2 3 4 5 6	Q. Isn't it true that you didn't want to be involved in a triangle between Bob and Tiffany, and that you were pulling away from the Bob and Tiffany dynamic?		
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23 (Pages 86 to 89)



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	Page 90		Page 91
1	G. C. ROBINSON	1	G. C. ROBINSON
2	doing for 11 years, right, because	2	situational, and some of them were
3	you told us earlier that your job	3	permanent. But I would add that
4	title didn't change?	4	regardless of my objection in doing
5	A. There were certain items	5	these, he would I would end up
6	and many of them I objected to or	6	having to do them. Or he would
7	had conversations with Bob about not	7	redirect it and there were
8	being involved in. Personal items	8	conversations where I would have to
9	when it came to or the kids.	9	sit down with Bob and constantly
10	There were many conversations about	10	realign my job, and find myself
11	that, but Bob continued to redirect	11	forced to do these personal items
12	my job to these personal items, or	12	after that conversation. It was
13	or being a part of things that he	13	incredibly frustrating and
14	and I had already discussed that I	14	demeaning. It was something that
15	objected to.	15	was strenuous through my employment.
16	Q. Did that impact your	16	Q. And the duties and
17	ability to do the other aspects of	17	responsibilities regarding , was
18	your job?	18	that situational or was that
19	A. When Bob would redirect my	19	permanent?
20	job or prioritize my job, it would	20	A. When we discussed it in
21	change what my job was.	21	September and October, it was
22	Q. These redirections that you	22	permanent in where he redirected
23	are talking about, were any of them	23	don't do this work, do less work.
24		24	
25	permanent or were they situational?  A. I think some of them were	25	And when I objected to doing it, he
2.5	A. I think some of them were		said that I was shaking him down,
	Page 92		Page 93
1		1	
1 2	G. C. ROBINSON	1 2	G. C. ROBINSON
2	G. C. ROBINSON and that he needed me to do the	2	G. C. ROBINSON Q. But what I am getting at
2 3	G. C. ROBINSON and that he needed me to do the Toukie Smith work, and the apartment	2 3	G. C. ROBINSON Q. But what I am getting at is, was that project or was that you
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2 3 4 5	G. C. ROBINSON and that he needed me to do the Toukie Smith work, and the apartment work, and that is what needed to be done and prioritized. So I would	2 3 4 5	G. C. ROBINSON Q. But what I am getting at is, was that project or was that you were it was now a component of your position from then on until the
2 3 4 5 6	G. C. ROBINSON and that he needed me to do the Toukie Smith work, and the apartment work, and that is what needed to be done and prioritized. So I would say that that was permanent. And	2 3 4 5 6	G. C. ROBINSON Q. But what I am getting at is, was that project or was that you were it was now a component of your position from then on until the future was going to be the design
2 3 4 5 6 7	G. C. ROBINSON and that he needed me to do the Toukie Smith work, and the apartment work, and that is what needed to be done and prioritized. So I would say that that was permanent. And then a discussion that we had in	2 3 4 5 6 7	G. C. ROBINSON Q. But what I am getting at is, was that project or was that you were it was now a component of your position from then on until the future was going to be the design furnishing of this home, what was
2 3 4 5 6 7 8	G. C. ROBINSON and that he needed me to do the Toukie Smith work, and the apartment work, and that is what needed to be done and prioritized. So I would say that that was permanent. And then a discussion that we had in January I tried to realign my	2 3 4 5 6 7 8	G. C. ROBINSON Q. But what I am getting at is, was that project or was that you were it was now a component of your position from then on until the future was going to be the design furnishing of this home, what was your understanding?
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	G. C. ROBINSON and that he needed me to do the Toukie Smith work, and the apartment work, and that is what needed to be done and prioritized. So I would say that that was permanent. And then a discussion that we had in January I tried to realign my position again, objected to doing additional work in the house where he made me agree to finishing four items that had to do with the hours, but I found myself involved more and more in Bob's domestic and personal life, and yeah. Q. So you understood that that was going to be permanent, that was going to be a permanent part of your job, is that right? A. It seemed as if it was going to be a permanent part of my job for the design, and for putting	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	G. C. ROBINSON Q. But what I am getting at is, was that project or was that you were it was now a component of your position from then on until the future was going to be the design furnishing of this home, what was your understanding? A. My understanding is that Bob wanted that prioritized and everything else was pushed to the side other than the work at The domestic, and housework, and then also the Toukie Smith items that is needed to be done. It was incredibly frustrating, and has nothing do with my title, with my title of VP finance. It had nothing to do with Canal Productions. It had to do with Bob's domestic home life, and the life of his ex-girlfriend.

24 (Pages 90 to 93)



	Page 94		Page 95
1	G. C. ROBINSON	1	G. C. ROBINSON
2	Q. You didn't have an	2	Q. In February of 2019, you
3	employment agreement guaranteeing	3	were in London?
4	you employment, did you?	4	A. Yes, that is I believe
5	A. No, not that I am aware of.	5	correct.
6	Q. He could have terminated	6	Q. You came back around
7	you at any time, correct?	7	February 25th?
8	A. Yes.	8	A. I can't recall when I came
9	Q. You could have left at any	9	back.
10	time?	10	Q. When you came back from
11	A. No. That was I don't	11	London, did you notice that Bob
12	believe that that would be correct.	12	wasn't talking to you?
13	Q. You couldn't have you	13	A. When I had come back from
14	couldn't have resigned if you wanted	14	from London, he actually had
15	to?	15	given me a call when I landed so I
16	A. I had resigned on multiple	16	don't so I don't think that would
17	occasions and was unable to resign	17	be completely correct.
18	for for many reasons.	18	Q. Okay.
19	Q. Okay. I guess we will come	19	When you came back from
20	back to that.	20	London, did you feel that you were
21	Now, in February of 2019,	21	going to be fired?
22	you were in London, is that right?	22	A. No.
23	A. Can you repeat your	23	Q. Did somebody tip you off
24	question? You broke up for a	24	that you were going to be fired?
25	second.	25	A. No.
	Daga 06		Daga 07
	Page 96		Page 97
1	G. C. ROBINSON	1	G. C. ROBINSON
2	G. C. ROBINSON Q. In other words, had someone	2	G. C. ROBINSON Q. So if you told Robin that
2 3	G. C. ROBINSON Q. In other words, had someone told you that you were going to be	2 3	G. C. ROBINSON Q. So if you told Robin that Tiffany had been harassing you
2 3 4	G. C. ROBINSON Q. In other words, had someone told you that you were going to be fired, not withstanding how you	2 3 4	G. C. ROBINSON Q. So if you told Robin that Tiffany had been harassing you daily, was that an exaggeration?
2 3 4 5	G. C. ROBINSON Q. In other words, had someone told you that you were going to be fired, not withstanding how you felt?	2 3 4 5	G. C. ROBINSON Q. So if you told Robin that Tiffany had been harassing you daily, was that an exaggeration? A. I think all e-mails and
2 3 4 5 6	G. C. ROBINSON Q. In other words, had someone told you that you were going to be fired, not withstanding how you felt? A. No.	2 3 4 5 6	G. C. ROBINSON Q. So if you told Robin that Tiffany had been harassing you daily, was that an exaggeration? A. I think all e-mails and issues of the house and items that
2 3 4 5 6 7	G. C. ROBINSON Q. In other words, had someone told you that you were going to be fired, not withstanding how you felt? A. No. Q. Did you begin to feel like	2 3 4 5 6 7	G. C. ROBINSON Q. So if you told Robin that Tiffany had been harassing you daily, was that an exaggeration? A. I think all e-mails and issues of the house and items that she was asking me to do, and was,
2 3 4 5 6 7 8	G. C. ROBINSON Q. In other words, had someone told you that you were going to be fired, not withstanding how you felt? A. No. Q. Did you begin to feel like you meant nothing to Bob?	2 3 4 5 6 7 8	G. C. ROBINSON Q. So if you told Robin that Tiffany had been harassing you daily, was that an exaggeration? A. I think all e-mails and issues of the house and items that she was asking me to do, and was, you know, harassment on the
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	G. C. ROBINSON Q. In other words, had someone told you that you were going to be fired, not withstanding how you felt? A. No. Q. Did you begin to feel like you meant nothing to Bob? A. I wouldn't characterize it that way. I feel that Q. I mean, I have your answer. That is fine. A. I don't know. I don't know if I would characterize it that way. Q. And at that point in time when you came back from London, is it true that Tiffany was harassing you daily? A. I feel there were a lot of of items that she was requiring of me to do, and on a lot of demeaning work and issues with the house that even when I was in London I was getting calls and e-mails	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	G. C. ROBINSON Q. So if you told Robin that Tiffany had been harassing you daily, was that an exaggeration? A. I think all e-mails and issues of the house and items that she was asking me to do, and was, you know, harassment on the apartment items house items. The for example, putting together a Q. I don't need examples. She accused you of stealing pots and pans at one point, correct? A. Yes. I had spoken to both Bob and Tom Harvey about that. Q. The answer to my question is yes? A. Can I finish, please? Q. No. It is a yes-or-no question. The judge has limited us to at least one day, I don't think we would like a third. She accused you of screwing
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	G. C. ROBINSON Q. In other words, had someone told you that you were going to be fired, not withstanding how you felt? A. No. Q. Did you begin to feel like you meant nothing to Bob? A. I wouldn't characterize it that way. I feel that Q. I mean, I have your answer. That is fine. A. I don't know. I don't know if I would characterize it that way. Q. And at that point in time when you came back from London, is it true that Tiffany was harassing you daily? A. I feel there were a lot of of items that she was requiring of me to do, and on a lot of demeaning work and issues with the house that even when I was in London	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	G. C. ROBINSON Q. So if you told Robin that Tiffany had been harassing you daily, was that an exaggeration? A. I think all e-mails and issues of the house and items that she was asking me to do, and was, you know, harassment on the apartment items house items. The for example, putting together a Q. I don't need examples. She accused you of stealing pots and pans at one point, correct? A. Yes. I had spoken to both Bob and Tom Harvey about that. Q. The answer to my question is yes? A. Can I finish, please? Q. No. It is a yes-or-no question. The judge has limited us to at least one day, I don't think we would like a third.

25 (Pages 94 to 97)



	Page 98		Page 99
1	G. C. ROBINSON	1	G. C. ROBINSON
2	plane, correct?	2	you?
3	A. She had made a bizarre	3	you? A. I
4	accusation about that.	4	Q. I will include texts in
5		5	that. E-mail or texts?
6	Q. She told you to stop	6	
7	e-mailing her? A. I had never I don't	7	A. I don't know. I mean, I think that
8		8	
9	recall ever her saying stop	9	Q. You said that you don't
10	e-mailing me. Q. Did you feel she was	10	know, so that is fine. Did she want
11		11	you gone?
12	controlling Bob at that time?	12	A. I believe that is something
13	A. No, I believe Bob was aware	13	that I felt at the very end of the
14	of everything. He was CC'd on all	14	last couple of days.
	the e-mails. It was discussed with him.	15	Q. Did you feel that your job
15			had been taken away from you?
16	Q. Did you believe that Bob	16	A. I believe, in general, my
17	was merely relaying what she had	17	job had been taken away when Bob
18	told him to say to you?	18	redirected me to his domestic to
19	A. I wouldn't say all the	19	handle his domestic home life and
20	time. I think that there was maybe	20	personal items. My job at Canal
21 22	one thing that conversation where	21 22	Productions kind of had been
	she was adding, you know, items that		redirected to all of this gender
23 24	she wanted to have Bob include.	23 24	female role where I was handling
25	Q. Did you believe that she	25	this housework, and vacuuming, and
23	was ghostwriting e-mails from him to	23	doing all of these things, and
	Page 100		Page 101
1		1	
1 2	G. C. ROBINSON	1 2	G. C. ROBINSON
2	G. C. ROBINSON organizing closets, and washing bed	2	G. C. ROBINSON mentally breaking down, and not
2 3	G. C. ROBINSON organizing closets, and washing bed sheets and making his bed. This is	2 3	G. C. ROBINSON mentally breaking down, and not eating or sleeping because of the
2 3 4	G. C. ROBINSON organizing closets, and washing bed sheets and making his bed. This is what my job had become. It had	2 3 4	G. C. ROBINSON mentally breaking down, and not eating or sleeping because of the incredibly toxic work environment
2 3	G. C. ROBINSON organizing closets, and washing bed sheets and making his bed. This is what my job had become. It had nothing do with VP production of	2 3	G. C. ROBINSON mentally breaking down, and not eating or sleeping because of the incredibly toxic work environment and just the just everything that
2 3 4 5	G. C. ROBINSON organizing closets, and washing bed sheets and making his bed. This is what my job had become. It had nothing do with VP production of finance. That was incredibly	2 3 4 5	G. C. ROBINSON mentally breaking down, and not eating or sleeping because of the incredibly toxic work environment and just the just everything that had been been going on. It was
2 3 4 5 6	G. C. ROBINSON organizing closets, and washing bed sheets and making his bed. This is what my job had become. It had nothing do with VP production of	2 3 4 5 6	G. C. ROBINSON mentally breaking down, and not eating or sleeping because of the incredibly toxic work environment and just the just everything that
2 3 4 5 6 7	G. C. ROBINSON organizing closets, and washing bed sheets and making his bed. This is what my job had become. It had nothing do with VP production of finance. That was incredibly demeaning and frustrating for me to	2 3 4 5 6 7	G. C. ROBINSON mentally breaking down, and not eating or sleeping because of the incredibly toxic work environment and just the just everything that had been been going on. It was very difficult at that time. I
2 3 4 5 6 7 8	G. C. ROBINSON organizing closets, and washing bed sheets and making his bed. This is what my job had become. It had nothing do with VP production of finance. That was incredibly demeaning and frustrating for me to deal with.	2 3 4 5 6 7 8	G. C. ROBINSON mentally breaking down, and not eating or sleeping because of the incredibly toxic work environment and just the just everything that had been been going on. It was very difficult at that time. I think that I think that it was a very traumatic time where I was
2 3 4 5 6 7 8 9	G. C. ROBINSON organizing closets, and washing bed sheets and making his bed. This is what my job had become. It had nothing do with VP production of finance. That was incredibly demeaning and frustrating for me to deal with.  Q. And when did that	2 3 4 5 6 7 8 9	G. C. ROBINSON mentally breaking down, and not eating or sleeping because of the incredibly toxic work environment and just the just everything that had been been going on. It was very difficult at that time. I think that I think that it was a very traumatic time where I was really sort of breaking down under
2 3 4 5 6 7 8 9	G. C. ROBINSON organizing closets, and washing bed sheets and making his bed. This is what my job had become. It had nothing do with VP production of finance. That was incredibly demeaning and frustrating for me to deal with.  Q. And when did that redirection start?  A. I had spoken to Bob and	2 3 4 5 6 7 8 9	G. C. ROBINSON mentally breaking down, and not eating or sleeping because of the incredibly toxic work environment and just the just everything that had been been going on. It was very difficult at that time. I think that I think that it was a very traumatic time where I was really sort of breaking down under the work, and the harassment, and
2 3 4 5 6 7 8 9 10	G. C. ROBINSON organizing closets, and washing bed sheets and making his bed. This is what my job had become. It had nothing do with VP production of finance. That was incredibly demeaning and frustrating for me to deal with.  Q. And when did that redirection start?	2 3 4 5 6 7 8 9 10	G. C. ROBINSON mentally breaking down, and not eating or sleeping because of the incredibly toxic work environment and just the just everything that had been been going on. It was very difficult at that time. I think that I think that it was a very traumatic time where I was really sort of breaking down under
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2 3 4 5 6 7 8 9 10 11 12 13	G. C. ROBINSON organizing closets, and washing bed sheets and making his bed. This is what my job had become. It had nothing do with VP production of finance. That was incredibly demeaning and frustrating for me to deal with. Q. And when did that redirection start? A. I had spoken to Bob and objected to this work at the end of September, beginning of October.	2 3 4 5 6 7 8 9 10 11 12 13	G. C. ROBINSON mentally breaking down, and not eating or sleeping because of the incredibly toxic work environment and just the just everything that had been been going on. It was very difficult at that time. I think that I think that it was a very traumatic time where I was really sort of breaking down under the work, and the harassment, and everything that was going on. Q. Was it a traumatic time for
2 3 4 5 6 7 8 9 10 11 12 13	G. C. ROBINSON organizing closets, and washing bed sheets and making his bed. This is what my job had become. It had nothing do with VP production of finance. That was incredibly demeaning and frustrating for me to deal with. Q. And when did that redirection start? A. I had spoken to Bob and objected to this work at the end of September, beginning of October. Q. Hadn't you agreed, in fact,	2 3 4 5 6 7 8 9 10 11 12 13	G. C. ROBINSON mentally breaking down, and not eating or sleeping because of the incredibly toxic work environment and just the just everything that had been been going on. It was very difficult at that time. I think that I think that it was a very traumatic time where I was really sort of breaking down under the work, and the harassment, and everything that was going on. Q. Was it a traumatic time for Bob, in your opinion, having come
2 3 4 5 6 7 8 9 10 11 12 13 14	G. C. ROBINSON organizing closets, and washing bed sheets and making his bed. This is what my job had become. It had nothing do with VP production of finance. That was incredibly demeaning and frustrating for me to deal with. Q. And when did that redirection start? A. I had spoken to Bob and objected to this work at the end of September, beginning of October. Q. Hadn't you agreed, in fact, to Bob's request that you take this	2 3 4 5 6 7 8 9 10 11 12 13 14 15	G. C. ROBINSON mentally breaking down, and not eating or sleeping because of the incredibly toxic work environment and just the just everything that had been been going on. It was very difficult at that time. I think that I think that it was a very traumatic time where I was really sort of breaking down under the work, and the harassment, and everything that was going on. Q. Was it a traumatic time for Bob, in your opinion, having come back from having going
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	G. C. ROBINSON organizing closets, and washing bed sheets and making his bed. This is what my job had become. It had nothing do with VP production of finance. That was incredibly demeaning and frustrating for me to deal with.  Q. And when did that redirection start?  A. I had spoken to Bob and objected to this work at the end of September, beginning of October.  Q. Hadn't you agreed, in fact, to Bob's request that you take this on?  A. I had objected to it, but I didn't have a choice. It is something that he asked me to, and I had to.  Q. Didn't you tell Robin Chambers that you agreed to it because you cared about him?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	G. C. ROBINSON mentally breaking down, and not eating or sleeping because of the incredibly toxic work environment and just the just everything that had been been going on. It was very difficult at that time. I think that I think that it was a very traumatic time where I was really sort of breaking down under the work, and the harassment, and everything that was going on. Q. Was it a traumatic time for Bob, in your opinion, having come back from having going through having to have a townhouse furnished for him?  A. I don't believe it is the place of an employer to put his personal problems on an employee. I don't I can't speculate what he found to be traumatic or not. I can

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G. C. ROBINSON asking for the 60-minute answers. I am asking for your impression as to whether or not Robert De Niro was going through a traumatic time in his life, in the fall of 2018 into early 2019? A. I don't know. These are decisions that he made. And again, he is an employer that should not put an employee in a position of having to deal with his, you know, personal issues.  Q. Okay. Can you answer MS. HARWIN: I just if you could sort of find a good time for a lunch break, that would be that would be appreciated. MR. DROGIN: Sure. Q. In your opinion, was this a traumatic time in his life?	G. C. ROBINSON difficult time in his life? A. I don't know if I would separate the decisions that he made, or what he was going through with other other times. I don't know if it was or wasn't. Q. Okay. MR. DROGIN: Can you read back my question? (Whereupon, the requested portion was read back by the reporter: Q: Did you believe it was a difficult time in his life?) A. I don't know. Q. Isn't it true that you resigned because of Tiffany, not Bob? A. No, I wouldn't say that is true. Q. Did you tell Robin
traumatic time in his life?  A. I don't I don't know.	Q. Did you tell Robin didn't you tell Robin, "In the end
25 Q. Did you believe it was a	25 it wasn't him. It was Tiffany?"
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A. Again, I don't know the full context of the of the discussion, but I will say that I had reached out to Bob on multiple cocasions to discuss and try to fix, you know, the issues that were going on. And my employer wasn't resolving any of these issues in the beginning of April and end of March. And it made it very difficult to the point where for me it was very emotionally distressing that my employer wasn't speaking to me about these issues. And I had hit a breaking point where I wasn't eating or sleeping. It was very traumatic for me, and I couldn't continue. (Playing recording) Q. Didn't you resign because of Tiffany not Bob?  MS. HARWIN: Can you identify for the record what what this exhibit is that you are using and what the	G. C. ROBINSON corresponding Bates number is?  MR. DROGIN: No. I am just asking the witness whether or not she told Robin that she resigned because of Tiffany not Bob. MS. HARWIN: Is the content of what was just played part of the record? THE COURT REPORTER: It was not taken down on the record, as I couldn't hear it clearly. Q. Didn't you tell that to Robin? MS. HARWIN: Is it part of the record or not? MR. DROGIN: Yeah, it is part of the record. MS. HARWIN: It needs to be identified in some way. MR. DROGIN: I will identify it after the witness





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1	G. C. ROBINSON	1	G. C. ROBINSON
2	answers my question as to	2	Canal Productions, and I would make
3	whether or not she told that	3	sure that items were handled for him
4	to Robin. That is my	4	and he was comfortable with whatever
5	question. We have hours of	5	needed to be transferred over to
6	these conversations where she	6	somebody else, and that it would
7	tells the truth.	7	take, you know, up to two years.
8	Q. So my question is, didn't	8	But it was something that he and I
9	you resign because of Tiffany, not	9	would discuss.
10	because of Bob?	10	Q. And if Tiffany had been out
11	A. No. Again, it is part of	11	of the picture, would you have
12	you know.	12	honored that commitment?
13	Q. Thank you.	13	A. I would have tried however
14	A. And having a context of	14	I could have tried to honor a
15	can I please finish?	15	commitment that I made.
16	Q. No. It was a yes-or-no	16	Q. I am asking specifically if
17	question. You said no. I take your	17	Tiffany was out of the picture.
18	answer at its word because you	18	Would you have tried to honor that
19	were	19	commitment?
20	(Simultaneous speaking)	20	A. As I said, I would try to
21	Q. You had an agreement with	21	honor a commitment that I made. I
22	Bob that you would work with him for	22	can't tell you what it would have
23	two years, correct?	23	been with or without Tiffany. I
24	A. We had a discussion that I	24	mean, you know
25	I wanted to transition out of	25	Q. You didn't honor your
	Page 108		Page 109
1	G. C. ROBINSON	1	G. C. ROBINSON
2	commitment, did you, you resigned?	2	What time do you want to
3	A. I resigned because it	3	come back, 1:30?
4	became it hit a breaking point	4	MS. HARWIN: That is
5	where I wasn't able to to	5	fine. Or 1:15?
6	continue with my job, as I said. I	6	MR. DROGIN: You choose.
7	was not eating or sleeping. I was	7	MS. HARWIN: Let's split
8	under a lot of had a lot of	8	the difference. Let's say
9	anxiety and just could not continue.	9	1:20.
10 11	Q. Okay.	10 11	MR. DROGIN: 1:20 it is.
12	MS. HARWIN: Are we at a good point for lunch?	12	(Whereupon, a recess was taken at this time.)
13	MR. DROGIN: We are. And	13	EXAMINATION BY
14	the just so we can provide	14	MR. BENNETT:
15	you with the sampling, that	15	Q. Good afternoon, Ms.
16	was Robinson recording number	16	Robinson. My name is Gregory
17	63. That appears at roughly	17	Bennett. I represent Defendants in
18	the 17 minute ten to 17:50	18	this case. I am going to be taking
19	mark. It is it is in	19	over the questioning from attorney
20	there. I think going forward	20	Drogin for a little while.
21	what we will do is have these	21	Okay?
22	things ready, and when we	22	A. Okay.
23	play back the conversations,	23	Q. In some of the answers that
24	we will identify them at that	24	you provided in attorney Drogin's
	··· - ··· - · · · - · · · · · · · · · ·		
25	time.	25	questions, it appeared that you may





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G. C. ROBINSON have lost track of the question. would just ask that you try to please confine your answer to the question. Do you understand? A. Yes. Q. Thank you. You went to Sacred Heart for high school, is that right? A. No. Q. Where did you go to high school? A. Saddle River Day School. Q. Did you go to a school called Sacred Heart at some poin A. Yes. Q. When? A. I went I don't know the years off the top of my head, but went there from kindergarten to beginning of the high school. Q. Okay. Saddle River Hill did you say?	I ne nt?	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	G. C. ROBINSON  A. Saddle River Day School. Q. Excuse me. That is in New Jersey? A. Yes. Q. After you graduated from high school, did you immediately begin attending St. Lawrence or did you work in between? A. I immediately attended St. Lawrence. Q. Did you focus in a particular area of study? A. English writing, speech and theater and film. Q. And did you have a minor? A. Let me clarify. Film, and speech, and theatre were minors. My major was English writing. Q. And did you graduate from St. Lawrence? A. Yes. Q. What type of degree? A. BA. Q. Okay.
1 G. C. ROBINSON 2 What year did you graduate 3 A. 2005. 4 Q. Aside from the BA that you acquired from St. Lawrence 6 University, in 2005, have you obtained any other degrees from educational institutions? 9 A. No other official degrees. 10 Q. Okay. 11 Have you obtained any certifications or licenses in any professional, clinical, or educational area? 15 A. No. Over the last year I do have certifications from class that I took in Spanish. 18 Q. Okay. 19 Are you a certified personal trainer? 21 A. No. 22 MS. HARWIN: Objection the form.	on ses	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	G. C. ROBINSON resulted in the acquisition or earning of a degree or certificate at all?  A. Not in the field of medicine or medical. Q. Okay. After graduating from St. Lawrence, did you start at Cardenas (ph)?  A. I Cardenas was my first official job after college. Q. You might have had a summer in between, but that was the first real job, correct? A. Yes. Q. How did you get that job? MS. HARWIN: Objection to the form. A. I had sent my resume to, I believe, the HR at Cardenas, and I was, I believe, called about the position.





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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	G. C. ROBINSON at that time?  MS. HARWIN: Objection to the form.  A. She was not currently working at Cardenas at the time.  Q. As far as you can recall, back when you applied to the position with Cardenas, did your mom have any type of acquaintances, or friendships, or was colleagues with anyone who was then employed with Cardenas?  MS. HARWIN: Objection to the form.  A. I can't I can't recall what colleagues or who my mother would have had contacts with. She worked she had worked at Cardenas	1 G. C. ROBINSON 2 the form. 3 A. I am not aware of he 4 pulling strings to get me er 5 at Cardenas. 6 Q. Okay. 7 What was the job that 8 were hired into at Cardena 9 A. To be the assistant to 10 Michael Robert, who was to 11 style director at Vanity Fai 12 Q. And generally you 13 have to go into too much d 14 But generally what were you 15 responsibilities in that posi 16 A. Picking up the phone 17 scheduling meetings for hi 18 the end I started to help an 19 gave me the opportunity to 20 photo shoots with him.	nployed syou s? the fashion r. don't etail. our job tion? e, m, towards d he
20 21 22 23 24 25	worked she had worked at Cardenas when she was younger. Q. As far as you can recall, did your mom pull strings to get you the job or not?  MS. HARWIN: Objection to	<ul> <li>photo shoots with him.</li> <li>Q. How long did you see</li> <li>that role?</li> <li>A. Almost two years, I</li> <li>believe.</li> <li>Q. And why did you lear</li> </ul>	
	Page 116		Page 117
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	G. C. ROBINSON  A. I left because I wanted to work in the film industry, not in publishing magazines or fashion.	G. C. ROBINSON  G. C. ROBINSON  Q. Okay. Prior to February of 2 you were a fairly avid runn that right?  MS. HARWIN: Objet the form.  A. I would say prior to sometime in the winter of 2 being February or March. Q. Okay. So before then you we avid runner? A. Yes. Q. Okay.  Okay. Why did you run? MS. HARWIN: Objet the form. A. Running was a way to battle the anxiety and stres faced. A way to relieve stre	ection to 2019, ere an ection to for me to s that I

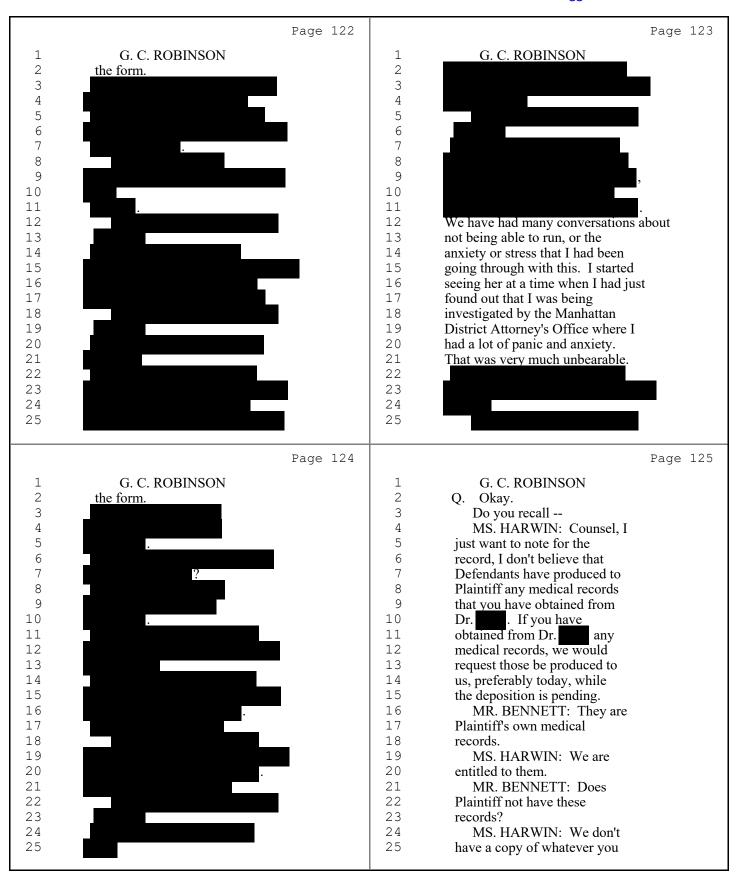
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1	G. C. ROBINSON	1	G. C. ROBINSON
2	anxiety.	2	able to put an average to it.
3	Q. I don't want to interrupt	3	Q. Could you give me a low and
4	you. Are you complete?	4	a high?
5	A. That is I mean, that is	5	MS. HARWIN: Objection to
6	what I can say at that moment.	6	the form.
7	Q. Aside from experiencing	7	A. I wouldn't be able to.
8	some relief regarding anxiety issues	8	Q. Were there times where you
9	that you may have experienced, did	9	ran ten times a week?
10	you otherwise enjoy running?	10	MS. HARWIN: Objection to
11	MS. HARWIN: Objection to	11	the form.
12	the form.	12	A. No.
13	A. I enjoyed running because	13	Q. Okay.
14	it gave me a mental break and helped	14	Were there times when you
15	with my anxiety and stress. It gave	15	didn't run at all on a particular
16	me this blank sort of Zen feeling to	16	week?
17	relieve it.	17	MS. HARWIN: Objection to
18	Q. Between January of 2016,	18	the form.
19	and April of 2019, how frequently,	19	A. Again, as I said, it
20	on average, ballpark, would you run	20	varied. So I just I can't recall
21	per week?	21	all the way from 2016 to 2019.
22	A. I can't recall weeks and	22	Q. Right.
23	months. It varies depending on what	23	What did it vary on, the
24	was going on with with work, or	24	level of stress?
25	weather, or I just wouldn't be	25	A. Sorry?
	Page 120		Page 121
1	G. C. ROBINSON	1	G. C. ROBINSON
2	Q. The level of stress, is	2	or, you know, put an average to a
3	that what it varied on?	3	month or week because everything
4	MS. HARWIN: Objection to	4	varied.
5	the form.	5	Q. Okay.
6	A. Not necessarily. As I	6	Was there a point in time
7	said, it varied depending on work,	7	where a bad condition developed
8	or weather, or, I mean, there were	8	which impaired or constricted you
9	many factors so	9	from running?
10	Q. Okay.	10	A. Yes.
11	I am just trying to have	11	Q. When was that?
12	some notion as to how much you would	12	A. During the project with the
13	run per week. We can take it on a	13	apartment.
14	monthly basis.	14	Q. So late fall, early late
15	Can you assume any	15	fall of 2018, early 2019?
16	numerical number to how often a week	16	MS. HARWIN: Objection to
17	or month you would run? Would you	17	the form.
18		1 1 0	A. Late fall. Late fall it
	run 20 times a month, or	18	
19	A. I mean, I would say I	19	became incredibly painful. In
19 20	A. I mean, I would say I would say more often than not, but	19 20	became incredibly painful. In January it became unbearable, and
19 20 21	A. I mean, I would say I would say more often than not, but again, I can't anything varied	19 20 21	became incredibly painful. In January it became unbearable, and the pain continued for quite a bit.
19 20 21 22	A. I mean, I would say I would say more often than not, but again, I can't anything varied upon what was depending on the job,	19 20 21 22	became incredibly painful. In January it became unbearable, and the pain continued for quite a bit. Q. Have you been able to
19 20 21 22 23	A. I mean, I would say I would say more often than not, but again, I can't anything varied upon what was depending on the job, what the weather was, if I had time,	19 20 21 22 23	became incredibly painful. In January it became unbearable, and the pain continued for quite a bit.  Q. Have you been able to resume running today?
19 20 21 22	A. I mean, I would say I would say more often than not, but again, I can't anything varied upon what was depending on the job,	19 20 21 22	became incredibly painful. In January it became unbearable, and the pain continued for quite a bit. Q. Have you been able to







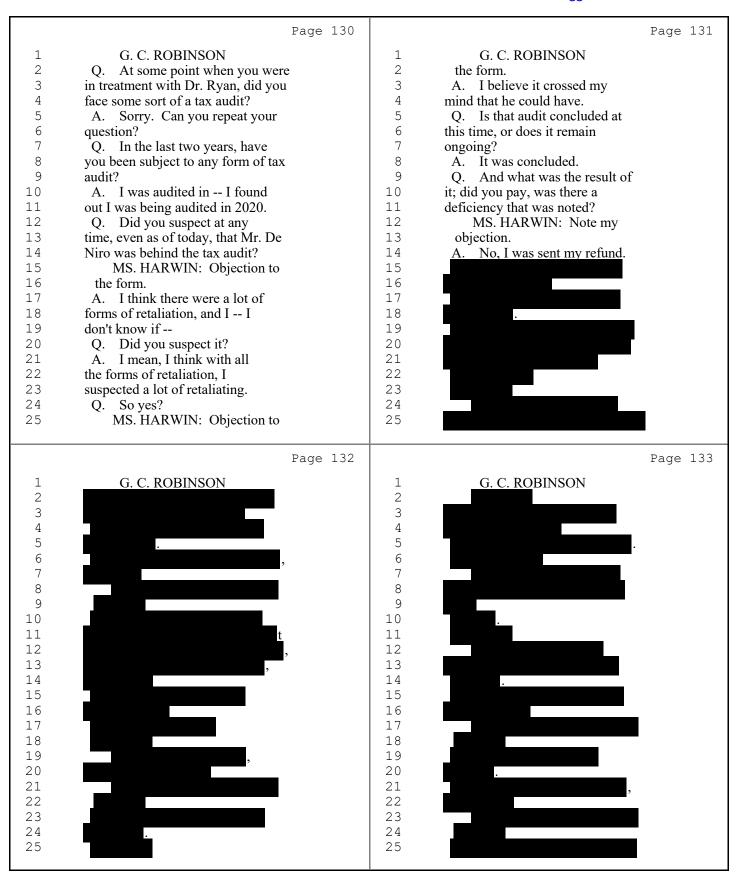
32 (Pages 122 to 125)

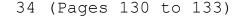


	Page 126		Page 127
	Page 126		Page 127
1	G. C. ROBINSON	1	
2	received from Dr. , no.	2	
3	MR. BENNETT: You don't	3	
4	have any medical records from	4	
5	Dr.	5	
6	MS. HARWIN: We don't	6	
7	have a copy of whatever Dr.	7	
8	provided to you.	8	
9	MR. BENNETT: That is not	9	·
10 11	what I am asking. Do you	10	Q. Do you remember ever
12	have the medical records	11 12	suggesting that it was because of
13	independently? Than what is the issue?	13	Mr. De Niro that you didn't want to
14	MS. HARWIN: I simply	14	go outside? A. I can't I can't recall
15	note that Defendants haven't	15	specifically why or what I had said
16		16	to her. I can recall the time not
17	produced these documents in discovery. If you are	17	feeling safe and wanting to go out.
18	relying on them, we are	18	I had just found out that I was
19	entitled to have them.	19	being investigated with the false
20	MR. BENNETT: The	20	allegations, and I did not feel
21	Defendants will make those	21	safe. I had mentioned to her that
22	records available to you	22	Bob was at times in my neighborhood,
23	following the deposition.	23	and that I had run into him and that
24	(Whereupon, a discussion	24	I didn't necessarily want to go out
25	was held off the record.)	25	or feel safe going out. I had a lot
	was note on the recently		or root sure going out. Thus a root
	Page 128		Page 129
1	G. C. ROBINSON	1	G. C. ROBINSON
2	of anxiety and felt safe at home. I	2	at my home.
3	felt	3	Q. So if I understand that
4	(Simultaneous speaking)	4	testimony correctly, you had no
5	Q. Sorry.	5	concerns about your physical safety,
6	A. I am finished.	6	but it was more of a psychological
7	<ul><li>Q. And you had concerns for</li></ul>	7	standpoint, is that correct?
8	your physical safety or something	8	A. I would probably say more
9	else?	9	that than my physical safety, but it
10	A. Again, I can't recall	10	had crossed my mind about my
11	specifically what I said to her.	11	physical safety with the lengths of
12	But I do remember feeling that it	12	retaliation that Bob and his agents
13	was very difficult. I was	13	have gone to that he has directed
14	incredibly humiliated and	14	them to go to.
15	embarrassed, and found it very hard	15	Q. And his agents, who are you
16	to go out and interact with people.	16	referring to when you say "his
17	I felt paranoid in a way that I was	17	agents?"
18	either being followed by a private	18	A. People who worked on the
19	investigator or photographer or	19 20	forms of retaliation and people who
20 21	something or someone else. I was	20	O Specifically who?
22	afraid to run into Bob, which I had	22	Q. Specifically who?
23	run into him twice close to my house, and I just felt I didn't feel	23	A. Tom Harvey. Q. Okay.
2.4	ac ac cate coinc out   really	7 / /	
24 25	as as safe going out. I really stayed where I felt safe, which was	24 25	Anyone else?  A. Not that I can recall.

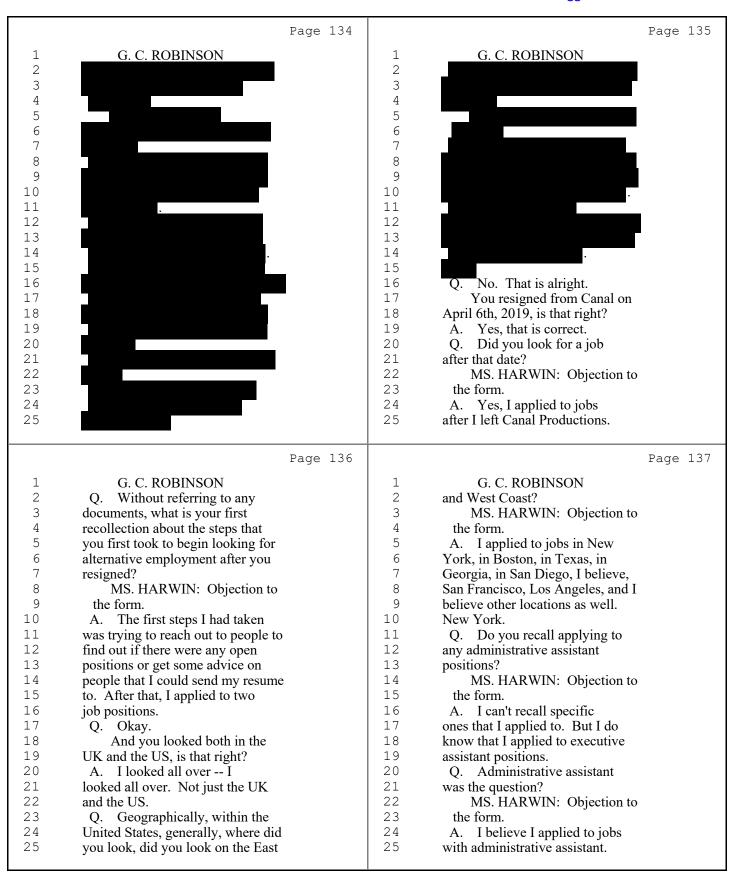
33 (Pages 126 to 129)















	Page 138		Page 139
1	G. C. ROBINSON	1	G. C. ROBINSON
2	Q. I am just going to list out	2	recall all of the jobs or the titles
3	a couple of titles. When I am done	3	that I applied to.
4	I am going to ask if they sound	4	Q. Do you recall when you
5	familiar to you in terms of	5	applied to well, withdrawn.
6	applications that you applied to for	6	Do you recall applying to
7	positions, okay?	7	the Juilliard School?
8	A. Yes.	8	MS. HARWIN: Objection to
9	Q. Senior director Warner	9	the form.
10	Brother, senior vice president of	10	A. I have applied to almost
11	productions Lions Gate, senior	11	400 jobs. I
12	production executive Amazon, senior	12	Q. If you don't recall, you
13	director unscripted production HBO,	13	don't recall. I am just wondering
14	creative director Hulu, director of	14	if you recall applying to the
15	original programming Show Time, VP	15	Juilliard School or not?
16	production Master Class. I am not	16	A. I don't
17	asking for you to have a perfect	17	Q. So no?
18	memory, but do these titles sound	18	A. No, I can't recall that
19	consistent with job applications	19	specific one.
20	that you submitted?	20	Q. Do you recall formulating
21	MS. HARWIN: Objection to	21	in your own mind during your job
22	the form.	22	hunt what the minimum salary
23	A. I don't want to speculate	23	requirement would be for you to
24	on a specific job. Some of the	24	accept the job?
25	companies sound familiar. I can't	25	MS. HARWIN: Objection to
	Page 140		Page 141
1	G. C. ROBINSON	1	G. C. ROBINSON
2	the form.	2	the form.
3	A C 11		the form.
	A. Could you repeat your	3	A. I have not had income from
4	A. Could you repeat your question?	3 4	
4 5			A. I have not had income from
	question? Q. Sure.	4	A. I have not had income from any job positions or employment.
5	question?	4 5	<ul><li>A. I have not had income from any job positions or employment.</li><li>Q. Have you had income from any sort whatsoever?</li></ul>
5 6	question? Q. Sure. In in coming up with	4 5 6	<ul><li>A. I have not had income from any job positions or employment.</li><li>Q. Have you had income from</li></ul>
5 6 7 8 9	question? Q. Sure. In in coming up with your strategy to decide to look for	4 5 6 7 8 9	<ul> <li>A. I have not had income from any job positions or employment.</li> <li>Q. Have you had income from any sort whatsoever?</li> <li>MS. HARWIN: Objection to</li> </ul>
5 6 7 8	question? Q. Sure. In in coming up with your strategy to decide to look for work following your resignation from	4 5 6 7 8	<ul> <li>A. I have not had income from any job positions or employment.</li> <li>Q. Have you had income from any sort whatsoever?</li> <li>MS. HARWIN: Objection to the form.</li> </ul>
5 6 7 8 9	question? Q. Sure. In in coming up with your strategy to decide to look for work following your resignation from Canal, did you come up with a salary	4 5 6 7 8 9 10	<ul> <li>A. I have not had income from any job positions or employment.</li> <li>Q. Have you had income from any sort whatsoever?</li> <li>MS. HARWIN: Objection to the form.</li> <li>A. I have not had income.</li> </ul>
5 6 7 8 9	question? Q. Sure. In in coming up with your strategy to decide to look for work following your resignation from Canal, did you come up with a salary figure that was the floor, the	4 5 6 7 8 9	<ul> <li>A. I have not had income from any job positions or employment.</li> <li>Q. Have you had income from any sort whatsoever?</li> <li>MS. HARWIN: Objection to the form.</li> <li>A. I have not had income.</li> <li>Q. Okay.</li> </ul>
5 6 7 8 9 10 11	question? Q. Sure. In in coming up with your strategy to decide to look for work following your resignation from Canal, did you come up with a salary figure that was the floor, the lowest that you would accept for a	4 5 6 7 8 9 10	<ul> <li>A. I have not had income from any job positions or employment.</li> <li>Q. Have you had income from any sort whatsoever?</li> <li>MS. HARWIN: Objection to the form.</li> <li>A. I have not had income.</li> <li>Q. Okay.</li> <li>How have you made ends meet</li> </ul>
5 6 7 8 9 10 11	question? Q. Sure. In in coming up with your strategy to decide to look for work following your resignation from Canal, did you come up with a salary figure that was the floor, the lowest that you would accept for a new job?	4 5 6 7 8 9 10 11	<ul> <li>A. I have not had income from any job positions or employment.</li> <li>Q. Have you had income from any sort whatsoever?</li> <li>MS. HARWIN: Objection to the form.</li> <li>A. I have not had income.</li> <li>Q. Okay.</li> <li>How have you made ends meet without income since 2019 in April?</li> </ul>
5 6 7 8 9 10 11 12	question? Q. Sure. In in coming up with your strategy to decide to look for work following your resignation from Canal, did you come up with a salary figure that was the floor, the lowest that you would accept for a new job? MS. HARWIN: Objection to	4 5 6 7 8 9 10 11 12 13	<ul> <li>A. I have not had income from any job positions or employment.</li> <li>Q. Have you had income from any sort whatsoever?</li> <li>MS. HARWIN: Objection to the form.</li> <li>A. I have not had income.</li> <li>Q. Okay.</li> <li>How have you made ends meet without income since 2019 in April?</li> <li>MS. HARWIN: Objection to</li> </ul>
5 6 7 8 9 10 11 12 13	question? Q. Sure. In in coming up with your strategy to decide to look for work following your resignation from Canal, did you come up with a salary figure that was the floor, the lowest that you would accept for a new job? MS. HARWIN: Objection to the form.	4 5 6 7 8 9 10 11 12 13 14 15 16	<ul> <li>A. I have not had income from any job positions or employment.</li> <li>Q. Have you had income from any sort whatsoever?</li> <li>MS. HARWIN: Objection to the form.</li> <li>A. I have not had income.</li> <li>Q. Okay.</li> <li>How have you made ends meet without income since 2019 in April?</li> <li>MS. HARWIN: Objection to the form.</li> </ul>
5 6 7 8 9 10 11 12 13 14 15	question? Q. Sure. In in coming up with your strategy to decide to look for work following your resignation from Canal, did you come up with a salary figure that was the floor, the lowest that you would accept for a new job? MS. HARWIN: Objection to the form. A. No.	4 5 6 7 8 9 10 11 12 13 14	A. I have not had income from any job positions or employment. Q. Have you had income from any sort whatsoever? MS. HARWIN: Objection to the form. A. I have not had income. Q. Okay. How have you made ends meet without income since 2019 in April? MS. HARWIN: Objection to the form. A. I have relied upon my
5 6 7 8 9 10 11 12 13 14 15	question? Q. Sure. In in coming up with your strategy to decide to look for work following your resignation from Canal, did you come up with a salary figure that was the floor, the lowest that you would accept for a new job? MS. HARWIN: Objection to the form. A. No. Q. And when you resigned from	4 5 6 7 8 9 10 11 12 13 14 15 16 17	<ul> <li>A. I have not had income from any job positions or employment.</li> <li>Q. Have you had income from any sort whatsoever?</li> <li>MS. HARWIN: Objection to the form.</li> <li>A. I have not had income.</li> <li>Q. Okay.</li> <li>How have you made ends meet without income since 2019 in April?</li> <li>MS. HARWIN: Objection to the form.</li> <li>A. I have relied upon my savings, and support from my family.</li> </ul>
5 6 7 8 9 10 11 12 13 14 15 16	question? Q. Sure. In in coming up with your strategy to decide to look for work following your resignation from Canal, did you come up with a salary figure that was the floor, the lowest that you would accept for a new job? MS. HARWIN: Objection to the form. A. No. Q. And when you resigned from Canal Productions, you were making a	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. I have not had income from any job positions or employment.  Q. Have you had income from any sort whatsoever?  MS. HARWIN: Objection to the form.  A. I have not had income.  Q. Okay.  How have you made ends meet without income since 2019 in April?  MS. HARWIN: Objection to the form.  A. I have relied upon my savings, and support from my family.  Q. Soon after you resigned and
5 6 7 8 9 10 11 12 13 14 15 16 17	question? Q. Sure. In in coming up with your strategy to decide to look for work following your resignation from Canal, did you come up with a salary figure that was the floor, the lowest that you would accept for a new job? MS. HARWIN: Objection to the form. A. No. Q. And when you resigned from Canal Productions, you were making a base of 300,000, is that right?	4 5 6 7 8 9 10 11 12 13 14 15 16 17	A. I have not had income from any job positions or employment.  Q. Have you had income from any sort whatsoever?  MS. HARWIN: Objection to the form.  A. I have not had income.  Q. Okay.  How have you made ends meet without income since 2019 in April?  MS. HARWIN: Objection to the form.  A. I have relied upon my savings, and support from my family.  Q. Soon after you resigned and you alluded to this earlier, you
5 6 7 8 9 10 11 12 13 14 15 16 17 18	question? Q. Sure. In in coming up with your strategy to decide to look for work following your resignation from Canal, did you come up with a salary figure that was the floor, the lowest that you would accept for a new job? MS. HARWIN: Objection to the form. A. No. Q. And when you resigned from Canal Productions, you were making a base of 300,000, is that right? A. Yes.	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	<ul> <li>A. I have not had income from any job positions or employment.</li> <li>Q. Have you had income from any sort whatsoever?</li> <li>MS. HARWIN: Objection to the form.</li> <li>A. I have not had income.</li> <li>Q. Okay.  How have you made ends meet without income since 2019 in April?  MS. HARWIN: Objection to the form.</li> <li>A. I have relied upon my savings, and support from my family.</li> <li>Q. Soon after you resigned and you alluded to this earlier, you heard from the New York District</li> </ul>
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	question? Q. Sure. In in coming up with your strategy to decide to look for work following your resignation from Canal, did you come up with a salary figure that was the floor, the lowest that you would accept for a new job? MS. HARWIN: Objection to the form. A. No. Q. And when you resigned from Canal Productions, you were making a base of 300,000, is that right? A. Yes. Q. Okay.	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. I have not had income from any job positions or employment.  Q. Have you had income from any sort whatsoever?  MS. HARWIN: Objection to the form.  A. I have not had income.  Q. Okay.  How have you made ends meet without income since 2019 in April?  MS. HARWIN: Objection to the form.  A. I have relied upon my savings, and support from my family.  Q. Soon after you resigned and you alluded to this earlier, you heard from the New York District Attorney's Office, is that right?
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	question? Q. Sure. In in coming up with your strategy to decide to look for work following your resignation from Canal, did you come up with a salary figure that was the floor, the lowest that you would accept for a new job? MS. HARWIN: Objection to the form. A. No. Q. And when you resigned from Canal Productions, you were making a base of 300,000, is that right? A. Yes. Q. Okay. So since your last paycheck	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. I have not had income from any job positions or employment.  Q. Have you had income from any sort whatsoever?  MS. HARWIN: Objection to the form.  A. I have not had income.  Q. Okay.  How have you made ends meet without income since 2019 in April?  MS. HARWIN: Objection to the form.  A. I have relied upon my savings, and support from my family.  Q. Soon after you resigned and you alluded to this earlier, you heard from the New York District Attorney's Office, is that right?  A. Yes.
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	question? Q. Sure. In in coming up with your strategy to decide to look for work following your resignation from Canal, did you come up with a salary figure that was the floor, the lowest that you would accept for a new job? MS. HARWIN: Objection to the form. A. No. Q. And when you resigned from Canal Productions, you were making a base of 300,000, is that right? A. Yes. Q. Okay. So since your last paycheck from Canal Productions, in April of	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. I have not had income from any job positions or employment.  Q. Have you had income from any sort whatsoever?  MS. HARWIN: Objection to the form.  A. I have not had income.  Q. Okay.  How have you made ends meet without income since 2019 in April?  MS. HARWIN: Objection to the form.  A. I have relied upon my savings, and support from my family.  Q. Soon after you resigned and you alluded to this earlier, you heard from the New York District Attorney's Office, is that right?  A. Yes.  Q. Okay.
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	question? Q. Sure. In in coming up with your strategy to decide to look for work following your resignation from Canal, did you come up with a salary figure that was the floor, the lowest that you would accept for a new job? MS. HARWIN: Objection to the form. A. No. Q. And when you resigned from Canal Productions, you were making a base of 300,000, is that right? A. Yes. Q. Okay. So since your last paycheck from Canal Productions, in April of 2019, have you had any stream or	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. I have not had income from any job positions or employment.  Q. Have you had income from any sort whatsoever?  MS. HARWIN: Objection to the form.  A. I have not had income.  Q. Okay.  How have you made ends meet without income since 2019 in April?  MS. HARWIN: Objection to the form.  A. I have relied upon my savings, and support from my family.  Q. Soon after you resigned and you alluded to this earlier, you heard from the New York District Attorney's Office, is that right?  A. Yes.  Q. Okay.  And did you retain legal





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			Page 143
1	G. C. ROBINSON	1	G. C. ROBINSON
2	A. Yes, I did.	2	it very clear, I am not intending to
3	Q. Who did you retain?	3	ask any question designed to elicit
4	A. Neighborhood Defender	4	communications between you and your
5	Service of Harlem.	5	counsel. I want to know if you
6	Q. Is that a not-for-profit	6	recall completing any paperwork in
7	service?	7	connection with the Neighborhood
8	A. Yes.	8	Defender Service?
9	Q. And did you have to	9	A. I can't recall.
10	compensate them in any way for their	10	Q. Did anyone assist you when
11	legal representation?	11	you first spoke with anyone from the
12	Ä. No.	12	Neighborhood Defender Service?
13	Q. Did you have to complete	13	MS. HARWIN: Objection to
14	any paperwork before they agreed to	14	the form. I would also note
15	represent you?	15	again to not provide any
16	MS. HARWIN: Objection.	16	attorney-client privilege
17	I would also direct the	17	communication.
18	client not to answer anything	18	A. Can you clarify assist,
19	that goes to attorney-client	19	what you mean by assist?
20	privileged communications.	20	Q. How did you first speak
21	MR. BENNETT: Unless	21	with anyone at the Neighborhood
22	that is a good point. I will	22	Defender Service, was it by phone,
23	be very clear.	23	or in person, or e-mail?
24		24	
25	Q. I am sure your counsel	25	MS. HARWIN: Objection to the form. I don't see how
23	already addressed this. Let me make	23	the form. I don't see now
	Page 144		Page 145
1	G. C. ROBINSON	1	G. C. ROBINSON
2	this doesn't encroach on	2	MS. HARWIN: Objection to
3	attorney-client privilege	3	the form.
4	issue.	4	A. I had spoken I connected
5	MR. BENNETT: I am simply	5	with him in regards to Canal, I
6	looking for how it was	6	believe, sometime in March.
7	initiated and whether a third	7	Q. Prior to March 2019, had
8	party who was not an attorney	8	you ever spoken to Attorney Pagano
9	was present. That is all I	9	before in your life?
10	am trying to figure out.	10	MS. HARWIN: Objection to
11	A. There was no third party	11	the form.
12	that wasn't an attorney that was	12	A. I believe I had. I don't
13	present.	13	recall exactly when.
14	Q. That is fine. But I think	14	Q. Was he an acquaintance of
15	the question I am looking for is,	15	your mom's?
16	how did you first speak with anyone	16	MS. HARWIN: Objection to
17	at Neighborhood Defender Services,	17	the form.
18	by person, by phone or e-mail?	18	A. He is a family attorney.
19	A. I believe it was by e-mail.	19	An attorney for my mother.
20		20	Q. Okay.
21		21	Between October 2016, and
22	attorney that you are familiar with,	22	the date that you resigned from
	is that right? A. Yes.	23	Canal, April 6, 2019, did you look
つつ		1 43	Canai, Adin U. 2017, ulu vuu 100K
23			
23 24 25	Q. When did you first meet Attorney Pagano?	24 25	for other employment opportunities?  MS. HARWIN: Objection to





1 G. C. ROBINSON 2 the form. 2 A. I am just going to clarify, 3 A. I am just going to clarify, 4 you said November of 2019? 5 Q. October of 2016, to April 6 2019? 7 A. Yes, I believe I did. 8 Q. Geographically, where were 9 you looking during that time period? 10 A. T believe New York, Los 11 Angeles, and the UK. 12 Q. Would you have used your 13 e-mail address to look for those 14 employment opportunities? 15 MS. HARWIN: Objection to 16 the form. 17 A. Can you clarify which 18 e-mail address are you speaking to? 19 Or are you talking about my Canal or 19 my personal 2 20 Q. No, your personal 3 21 Q. No, your personal 3 22 address? 23 A. Yes, I would have used my 24 address? 25 Q. Okay. 26 Q. Did you fave used word 27 Yes. 28 Q. Okay. 29 Page 148  1 G. C. ROBINSON 2 April 6, 2019, to March 15, 2020, did you leave New York State? 3 A. Did I leave New York State? 4 A. Did I leave New York State? 5 Yes. 6 Q. When was the first date 1 that you led New York? 8 MS. HARWIN: Objection to 1 the form. 9 the form. 1 A. I can't recall the specific 1 date. 1 I address. 1 G. C. ROBINSON 2 April 6, 2019, to March 15, 2020; did you stay with 1 G. C. ROBINSON 2 A Did I leave New York State? 3 A. Yes, I would have used my 4 A. Did I leave New York State? 5 Yes. 6 Q. When was the first date 1 that you led New York? 8 MS. HARWIN: Objection to 1 the form. 9 the form. 1 A. I can't recall the specific 1 date. 1 Co. Did -did you resigned on April 2 A. Yes, I would address or the specific of the form. 1 A. Can you resigned on April 3 G. C. ROBINSON 4 A. Did I leave New York State? 4 A. Tean't recall the specific 1 G. C. ROBINSON 2 April 6, 2019, to March 15, 2020, did you stay with 3 Ms. HARWIN: Objection to 4 A. A couple of days I believe. 1 Can't recall the specific of the form. 1 A. Can't recall the specific of the form. 1 A. Can't recall the specific of the form. 2 A. A can you repease of the farm of the form. 3 A. A can you do day and you stay with 4 A. I can't recall the - the 5 purpose. 5 Q. Welt, you resigned on April 6 Q. Did		Dago 146		Dago 147
the form.  A Lam just going to clarify, you said November of 2019?  A. Yes, I believe I did. Q. Geographically, where were you looking during that time period? A. T believe New York, Los 11 A. T believe New York, Los 12 Q. Would you have used your e-mail address to look for those cmployment opportunities? MS. HARWIN: Objection to the form.  A. Can you clarify which e-mail address are you speaking to? Or now your personal address? Q. No, your personal A. Yes, I would have used my A. Do you recall with whom you were networking. Looking for work. Q. Okay.  Page 148  Page 148  Page 149		Page 146		Page 147
A. I am just going to clarify, 4 you said November of 2019? 5 Q. October of 2016, to April 6 2019? 7 A. Yes, I believe I did. 8 Q. Geographically, where were 9 you looking during that time period? 10 A. I believe New York, Los 11 Angeles, and the UK. 12 Q. Would you have used your 13 e-mail address to look for those 14 employment opportunities? 15 MS. HARWIN: Objection to 16 the form. 16 the form. 17 A. Can you clarify which 18 e-mail address are you speaking to? 19 Or are you talking about my Canal or 19 presental — 20 Q. No, your personal — 21 Q. No, your personal — 22 address? 23 A. Yes, I would have used my 24 address? 25 Q. Okay.  Page 148  1 G. C. ROBINSON April 6, 2019, to March 15, 3 2020? 4 A. Did I leave New York State? 5 Yes. 6 Q. When was the first date 5 Yes. 6 Q. When was the first date 6 Q. Well you resigned on April 6 A. I carn't recall the specific 6 date. 10 Q. Did you — 11 Carn trecall the specific 11 date. 12 Q. Well, you resigned on April 13 G. 2019, right? 14 A. Yes. 15 Q. Did you — 16 MS. HARWIN: Objection to 16 the form. 17 A. Can you go on a trip 18 MS. HARWIN: Objection to 19 The form. 10 A. I carn't recall the specific 10 A. I carn't recall the specific 11 date. 12 Q. Well, you resigned on April 13 G. 2019, right? 14 A. Yes. 15 MS. HARWIN: Objection to 16 the form. 17 MS. HARWIN: Objection to 18 The form. 19 Q. Did - did you go on a trip 19 within a month? 20 MS. HARWIN: Objection to 21 the form. 21 MS. HARWIN: Objection to 22 MS. HARWIN: Objection to 23 MS. HARWIN: Objection to 24 MS. HARWIN: Objection to 25 MS. HARWIN: Objection to 26 MS. HARWIN: Objection to 27 MS. HARWIN: Objection to 28 MS. HARWIN: Objection to 29 MS. HARWIN: Objection to 20 MS. HARWIN: Objection to 21 the form. 22 A. I believe. 23 Q. Where did you go? 24 A. Los Angeles. 25 When did you book that				
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A. No. I think that I would   A. No. I think that I would   clarify and say that I didn't apply   for specific jobs. I had been   networking. Looking for work.				
11				
12   Q, Would you have used your e-mail address to look for those e-mail address are you speaking to?				
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16 the form. 17 A. Can you clarify which 18 e-mail address are you speaking to? 19 Or are you talking about my Canal or 20 my personal - 21 Q. No, your personal 22 address? 22 address? 23 A. Yes, I would have used my 24 address. 25 Q. Okay.  Page 148  Page 148  Page 149  1 G. C. ROBINSON 2 April 6, 2019, to March 15, 2020 or 3 Q. Where did you stay? 4 A. Did I leave New York State? 4 A. Did I leave New York State? 5 Q. When was the first date that you left New York? 8 MS. HARWIN: Objection to the form. 10 A. I can't recall the specific date. 11 CQ. Well, you resigned on April 6, 2019, right? 14 A. Yes. 15 Q. Did you - 16 MS. HARWIN: Objection to the form. 16 MS. HARWIN: Objection to the form. 17 MS. HARWIN: Objection to the form. 18 Q. Did - did you go on a trip within a month? 19 within a month? 10 MS. HARWIN: Objection to the form. 10 MS. HARWIN: Objection to the form. 11 MS. HARWIN: Objection to the form. 12 MS. HARWIN: Objection to the form. 13 Q. Wither did you go on a trip within a month? 14 A. Yes. 15 Q. Did you - 15 MS. HARWIN: Objection to the form. 16 MS. HARWIN: Objection to the form. 17 MS. HARWIN: Objection to the form. 18 Q. Did - did you go on a trip 19 within a month? 20 MS. HARWIN: Objection to the form. 21 MS. HARWIN: Objection to the form. 22 A. I believe. 23 Q. Where did you go? 24 A. Los Angeles. 24 Sorry. 25 Sorry. 26 C. ROBINSON 27 A. Can you repeat that? 28 A. Can you repeat that? 29 A. No. O. 30 Q. That is okay.  Page 149  Page 149  Page 149  Page 149  Fage 149  Fage 149  A. Can you repeat that? 30 Q. Where did you stay? 4 A. No. 9 Q. Were did you go and trip the form. 17 professional? 30 Q. Were did you go on a trip the form. 31 Q. Was it personal or was it professional? 32 Q. Where did you go? 33 Q. Where did you book that 34 A. Los Angeles. 35 Q. Okay. 36 Marchaving a little bit, but also personal. 37 Q. When did you book that				
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21    Q. No, your personal   22    March 15, 2020, did you leave New   22    York State?   22    York State?   3    A. Yes, I would have used my   23    A. Can you repeat that?   Sorry.   25    Q. Okay.   25    Q. That is okay.				
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A. Yes, I would have used my address. Q. Okay.  Page 148  Page 149  G. C. ROBINSON April 6, 2019, to March 15, 2020? A. Did I leave New York State? G. When was the first date that you left New York? MS. HARWIN: Objection to date.  A. I can't recall the specific date.  Q. Well, you resigned on April 6, 2019, right? A. Yes.  Q. Well, you resigned on April 6, 2019, right? A. Yes.  G. C. ROBINSON A. No. A. No. A. I stayed with Amelia Brain, who was a former employee of Canal. Q. Yes. We will get there in a moment. How long did you stay with Ms. Brain during that trip? A. A couple of days I believe. I can't recall the specific uniber. Q. Well, you resigned on April that trip? A. Yes. A. Yes. A. I can't recall the - the form.  MS. HARWIN: Objection to the form. Q. Did did you go on a trip within a month? MS. HARWIN: Objection to the form. A. I can't recall the the professional? MS. HARWIN: Objection to the form. A. I believe it was both. It was networking a little bit, but also personal. A. Los Angeles. A. Los Angeles. A. Los Angeles. A. Los Angeles. A. When did you book that				
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1 G. C. ROBINSON 2 April 6, 2019, to March 15, 3 2020? 4 A. Did I leave New York State? 5 Yes. 6 Q. When was the first date 7 that you left New York? 8 MS. HARWIN: Objection to 9 the form. 11 G. C. ROBINSON 2 A. No. 3 Q. Where did you stay? 4 A. I stayed with Amelia Brain, 8 who was a former employee of Canal. 9 Q. Yes. We will get there in 9 a moment. 10 How long did you stay with 11 I can't recall the specific 10 A. A couple of days I believe. 12 Q. Well, you resigned on April 12 Q. And what was the purpose of 13 6, 2019, right? 14 A. Yes. 15 Q. Did you 16 MS. HARWIN: Objection to 17 the form. 18 Q. Did did you go on a trip 18 Q. Was it personal or was it 19 purpose. 19 within a month? 20 MS. HARWIN: Objection to 21 the form. 22 A. I believe. 23 Q. Where did you go? 24 A. Los Angeles. 24 Where did you book that	25	Q. Okay.	25	Q. That is okay.
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A. Did I leave New York State? Yes.  O. When was the first date that you left New York?  MS. HARWIN: Objection to the form.  O. Well, you resigned on April A. Yes.  O. Did you the form.  MS. HARWIN: Objection to  MS. HARWIN: Objection to  MS. HARWIN: Objection to  MS. Brain during that trip?  A. A couple of days I believe.  I can't recall the specific number.  Q. And what was the purpose of that trip?  A. Yes.  MS. HARWIN: Objection to  A. I can't recall the the purpose.  A. I can't recall the the purpose.  A. I believe it was both. It was networking a little bit, but also personal.  Q. Okay.  O. Okay.  When did you book that	1	_	1	-
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Q. Where did you stay, hotel? 25 trip?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	G. C. ROBINSON April 6, 2019, to March 15, 2020? A. Did I leave New York State? Yes. Q. When was the first date that you left New York? MS. HARWIN: Objection to the form. A. I can't recall the specific date. Q. Well, you resigned on April 6, 2019, right? A. Yes. Q. Did you MS. HARWIN: Objection to the form. Q. Did did you go on a trip within a month? MS. HARWIN: Objection to the form. A. I believe. Q. Where did you go?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	G. C. ROBINSON A. No. Q. Where did you stay? A. I stayed with Amelia Brain, who was a former employee of Canal. Q. Yes. We will get there in a moment. How long did you stay with Ms. Brain during that trip? A. A couple of days I believe. I can't recall the specific number. Q. And what was the purpose of that trip? MS. HARWIN: Objection to the form. A. I can't recall the the purpose. Q. Was it personal or was it professional? A. I believe it was both. It was networking a little bit, but also personal. Q. Okay.
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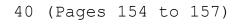


	Page 150		Page 151
1	G. C. ROBINSON	1	G. C. ROBINSON
2	A. I can't recall exactly when	2	refresh your recollection as to the
3	I booked the trip.	3	trips that you took between April 6,
4	Q. Did you fly?	4	2019 and March 15, 2020?
5	A. Yes.	5	A. Not not on me.
6		6	
7	Q. What airline?	7	Q. I understand that.
	A. Delta.	1	But what documents would
8	Q. Okay.	8	you look at to refresh your
9	After that, you returned to	9	recollection?
10	your apartment in New York City, is	10	MS. HARWIN: Objection to
11	that right?	11	the form.
12	A. Yes.	12	A. Records would include my
13	Q. Okay.	13	flight, my tickets.
14	So if roughly we are	14	Q. So do you recall again,
15	still in May of 2019, is that fair?	15	April 6, 2019, to March 15, 2020, do
16	A. Yes.	16	you recall going to Spain?
17	Q. Okay.	17	A. Yes.
18	From May of 2019 forward,	18	Q. How many times?
19	what is your next trip?	19	A. I believe it was once.
20	MS. HARWIN: Objection to	20	Q. Where did you stay?
21	the form.	21	MS. HARWIN: Objection to
22	A. I can't recall what my next	22	the form.
23	trip was after that.	23	A. A hotel.
24	Q. Are there any records that	24	Q. Do you recall the hotel, is
25	you could refer to that would	25	it the Four Seasons?
	Page 152		Page 153
1	Page 152 G. C. ROBINSON	1	Page 153 G. C. ROBINSON
2	G. C. ROBINSON A. No.	2	G. C. ROBINSON time.
	G. C. ROBINSON	2 3	G. C. ROBINSON
2 3 4	G. C. ROBINSON A. No.	2 3 4	G. C. ROBINSON time.
2 3	G. C. ROBINSON A. No. Q. Do you recall the hotel?	2 3	G. C. ROBINSON time. Q. Do you recall where you
2 3 4	G. C. ROBINSON A. No. Q. Do you recall the hotel? A. I can't recall the name of	2 3 4	G. C. ROBINSON time. Q. Do you recall where you stayed when you went to LA on that
2 3 4 5	G. C. ROBINSON A. No. Q. Do you recall the hotel? A. I can't recall the name of the hotel. Q. Okay.	2 3 4 5	G. C. ROBINSON time. Q. Do you recall where you stayed when you went to LA on that occasion?
2 3 4 5 6 7 8	G. C. ROBINSON  A. No. Q. Do you recall the hotel? A. I can't recall the name of the hotel. Q. Okay. Aside from Spain, did you go to London?	2 3 4 5 6	G. C. ROBINSON time. Q. Do you recall where you stayed when you went to LA on that occasion? A. I stayed at, I believe, the Four Seasons with my mother. Q. So for the two LA trips,
2 3 4 5 6 7 8 9	G. C. ROBINSON A. No. Q. Do you recall the hotel? A. I can't recall the name of the hotel. Q. Okay. Aside from Spain, did you	2 3 4 5 6 7 8	G. C. ROBINSON time. Q. Do you recall where you stayed when you went to LA on that occasion? A. I stayed at, I believe, the Four Seasons with my mother. Q. So for the two LA trips, the one to Spain, the one to the UK,
2 3 4 5 6 7 8	G. C. ROBINSON  A. No. Q. Do you recall the hotel? A. I can't recall the name of the hotel. Q. Okay. Aside from Spain, did you go to London?	2 3 4 5 6 7 8	G. C. ROBINSON time. Q. Do you recall where you stayed when you went to LA on that occasion? A. I stayed at, I believe, the Four Seasons with my mother. Q. So for the two LA trips,
2 3 4 5 6 7 8 9	G. C. ROBINSON  A. No. Q. Do you recall the hotel? A. I can't recall the name of the hotel. Q. Okay. Aside from Spain, did you go to London? MS. HARWIN: Objection to	2 3 4 5 6 7 8	G. C. ROBINSON time. Q. Do you recall where you stayed when you went to LA on that occasion? A. I stayed at, I believe, the Four Seasons with my mother. Q. So for the two LA trips, the one to Spain, the one to the UK,
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2 3 4 5 6 7 8 9 10	G. C. ROBINSON A. No. Q. Do you recall the hotel? A. I can't recall the name of the hotel. Q. Okay. Aside from Spain, did you go to London? MS. HARWIN: Objection to the form. A. I can't recall what month, but I did go to London.	2 3 4 5 6 7 8 9 10	G. C. ROBINSON time. Q. Do you recall where you stayed when you went to LA on that occasion? A. I stayed at, I believe, the Four Seasons with my mother. Q. So for the two LA trips, the one to Spain, the one to the UK, you flew to all four of those locations, correct?
2 3 4 5 6 7 8 9 10 11	G. C. ROBINSON A. No. Q. Do you recall the hotel? A. I can't recall the name of the hotel. Q. Okay. Aside from Spain, did you go to London? MS. HARWIN: Objection to the form. A. I can't recall what month,	2 3 4 5 6 7 8 9 10 11	G. C. ROBINSON time. Q. Do you recall where you stayed when you went to LA on that occasion? A. I stayed at, I believe, the Four Seasons with my mother. Q. So for the two LA trips, the one to Spain, the one to the UK, you flew to all four of those locations, correct? A. To LA, to Spain, to UK,
2 3 4 5 6 7 8 9 10 11 12 13	G. C. ROBINSON A. No. Q. Do you recall the hotel? A. I can't recall the name of the hotel. Q. Okay. Aside from Spain, did you go to London? MS. HARWIN: Objection to the form. A. I can't recall what month, but I did go to London. Q. How many times did you go	2 3 4 5 6 7 8 9 10 11 12	G. C. ROBINSON time. Q. Do you recall where you stayed when you went to LA on that occasion? A. I stayed at, I believe, the Four Seasons with my mother. Q. So for the two LA trips, the one to Spain, the one to the UK, you flew to all four of those locations, correct? A. To LA, to Spain, to UK, yes.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15	G. C. ROBINSON  A. No. Q. Do you recall the hotel? A. I can't recall the name of the hotel. Q. Okay. Aside from Spain, did you go to London? MS. HARWIN: Objection to the form. A. I can't recall what month, but I did go to London. Q. How many times did you go to London between those time	2 3 4 5 6 7 8 9 10 11 12 13 14	G. C. ROBINSON time. Q. Do you recall where you stayed when you went to LA on that occasion? A. I stayed at, I believe, the Four Seasons with my mother. Q. So for the two LA trips, the one to Spain, the one to the UK, you flew to all four of those locations, correct? A. To LA, to Spain, to UK, yes. Q. Three locations on four occasions, correct? A. Yes.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	G. C. ROBINSON A. No. Q. Do you recall the hotel? A. I can't recall the name of the hotel. Q. Okay. Aside from Spain, did you go to London? MS. HARWIN: Objection to the form. A. I can't recall what month, but I did go to London. Q. How many times did you go to London between those time periods? MS. HARWIN: Objection to the form. A. I believe I stayed in London one time. Q. And did you go to LA again or within that timeframe? MS. HARWIN: Objection to	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	G. C. ROBINSON time. Q. Do you recall where you stayed when you went to LA on that occasion? A. I stayed at, I believe, the Four Seasons with my mother. Q. So for the two LA trips, the one to Spain, the one to the UK, you flew to all four of those locations, correct? A. To LA, to Spain, to UK, yes. Q. Three locations on four occasions, correct? A. Yes. Q. And you used Delta for each flight or a different airline? A. I used Delta. Q. And do you recall if you booked any of those trips after April 6, 2019?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	G. C. ROBINSON A. No. Q. Do you recall the hotel? A. I can't recall the name of the hotel. Q. Okay. Aside from Spain, did you go to London? MS. HARWIN: Objection to the form. A. I can't recall what month, but I did go to London. Q. How many times did you go to London between those time periods? MS. HARWIN: Objection to the form. A. I believe I stayed in London one time. Q. And did you go to LA again or within that timeframe? MS. HARWIN: Objection to the form.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	G. C. ROBINSON time. Q. Do you recall where you stayed when you went to LA on that occasion? A. I stayed at, I believe, the Four Seasons with my mother. Q. So for the two LA trips, the one to Spain, the one to the UK, you flew to all four of those locations, correct? A. To LA, to Spain, to UK, yes. Q. Three locations on four occasions, correct? A. Yes. Q. And you used Delta for each flight or a different airline? A. I used Delta. Q. And do you recall if you booked any of those trips after April 6, 2019? MS. HARWIN: Objection to
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	Page 154			Page	155
1 2 3 4 5	G. C. ROBINSON of them were trips that I discussed with with Bob, while I was still at Canal. Q. The answer was yes, if I	1 2 3 4 5	G. C. ROBINSON Q. Do you recall speaking with her before March 15, 2020, withdrawn. Do you recall speaking with	9 0	,
6 7 8 9	understood? A. Yes. Q. Okay. Ms. Brain, you mentioned her recently. When is the last time	6 7 8 9	her after March 15, 2020?  A. After March 15th, 2020?  Q. Yes.  A. I can't recall the last time I spoke to Lu Lu White.		
11 12 13 14 15	you spoke to her? A. I can't recall the last time I spoke to her. Q. Have you ever spoken to her in 2021?	11 12 13 14 15	MR. BENNETT: I am going to counsel, I am going to send the first exhibit around. Q. Ms. Robinson, you have		
16 17 18 19 20	A. I don't recall we communicated in 2021. Q. Lu Lu or Lu White, Louisa I believe was her full name, but you know her as Lu Lu, is that	16 17 18 19 20	access to e-mail, I assume?  A. My applications aren't open, but yes.  MR. BENNETT: I will send it to you and you forward it		
21 22 23 24 25	right? A. Yes. Q. Have you spoken to her in 2021? A. No.	21 22 23 24 25	on to your client however you would like.  MS. HARWIN: One thing Greg that I believe you could do is you could drop a		
	Page 156			Page	157
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	G. C. ROBINSON document into the chat so if you would like Ms. Robinson to open a document without the need for opening an e-mail application that could be a way to do that. A. Can we take a quick break? Q. Sure. Yes. We will come back at 2:20 if that is okay? A. That is perfect. (Whereupon, a recess was taken at this time.) Q. Ms. Robinson, so off the record we circulated the first exhibit, and I think we are going to refer to this as Exhibit A. I believe your counsel has sent it to you through e-mail as well. If you can do whatever you need to do to open the e-mail and open the attachment, I would appreciate it. (Whereupon, ROBINSON Exhibit A, a three-page PDF	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	G. C. ROBINSON document that was filed in the New York State Action as document number 10, was marked for identification, as of this date.) MR. BENNETT: While Ms. Robinson is doing that, I am going to describe what the document is for the record. It is a three-page PDF document that was filed in the New York State Action as document number 10. A. I see Exhibit D and Exhibit E 191213. Q. Sorry. Just give me a moment, please. It says, "A1319?" A. The top of it says, "81319" and in it it has book marks of Q. I see that, too. I don't know where that comes from to be honest. So I am going to direct your attention to to the three-page document. I am going t		





	D 15	0	D 1F0
	Page 15		Page 159
1	G. C. ROBINSON	1	G. C. ROBINSON
2	direct your attention to the bottom	2	Q. Within that paragraph, if
3	of page one, and I am going to	3	you look sort of in the middle and
4	describe it for you, and we will go	4	it is going to be seven six lines
5	down to the second page. It as an	5	down, and it is a sentence that
6	e-mail from Jeffery Pagano to	6	begins with "On the other hand."
7	Laurent Drogin, dated August 13,	7	A. Okay. Yes, I see that.
8	2019, at 2:53 p.m.	8	Q. If you can, just read that
9	Do you see that?	9	sentence to yourself and I am going
10	A. Yes.	10	to ask you a question.
11	Q. At the time, August 13,	11	A. (Witness complies).
12	2019, tell me if I am wrong,	12	Okay.
13	Attorney Pagano was representing	13	Q. Do you have any plans to
14	you, correct?	14	write a book about your experience
15	A. August 2019?	15	working with Mr. De Niro?
16	Q. Yes.	16	MS. HARWIN: Objection to
17	A. Yes.	17	the form.
18	Q. Okay.	18	A. No.
19	Now if you go to the second	19	Q. Have you spoken with anyone
20	page, I am going to direct your	20	about that?
21	attention to the paragraph that	21	MS. HARWIN: Objection to
22	starts with, "We recognize."	22	the form.
23	Do you see that on the	23	A. No. Not that I can recall.
24		24	
25	second page? A. Yes, I do.	25	Q. Okay. And then if you can, in the
23	A. 108, 100.	2.5	And then if you can, in the
	Page 16	0	Page 161
1	Page 16 G. C. ROBINSON	1	Page 161 G. C. ROBINSON
1 2	G. C. ROBINSON		
	G. C. ROBINSON same paragraph, the next sentence	1	G. C. ROBINSON
2 3	G. C. ROBINSON same paragraph, the next sentence which begins with "Unfortunately,"	1 2 3	G. C. ROBINSON is it. A. Yes, and I added. I added
2 3 4	G. C. ROBINSON same paragraph, the next sentence	1 2 3 4	G. C. ROBINSON is it. A. Yes, and I added. I added to it.
2 3 4 5	G. C. ROBINSON same paragraph, the next sentence which begins with "Unfortunately," do you see that?  A. Yes.	1 2 3	G. C. ROBINSON is it. A. Yes, and I added. I added to it. Q. So did you do you agree
2 3 4	G. C. ROBINSON same paragraph, the next sentence which begins with "Unfortunately," do you see that? A. Yes. Q. If you can, just please	1 2 3 4 5	G. C. ROBINSON is it. A. Yes, and I added. I added to it. Q. So did you do you agree with the accuracy of that sentence?
2 3 4 5 6 7	G. C. ROBINSON same paragraph, the next sentence which begins with "Unfortunately," do you see that? A. Yes. Q. If you can, just please read that sentence to yourself, and	1 2 3 4 5 6 7	G. C. ROBINSON is it. A. Yes, and I added. I added to it. Q. So did you do you agree with the accuracy of that sentence? A. Yes, at the time I did, but
2 3 4 5 6 7 8	G. C. ROBINSON same paragraph, the next sentence which begins with "Unfortunately," do you see that? A. Yes. Q. If you can, just please read that sentence to yourself, and I will ask you a question when you	1 2 3 4 5 6 7 8	G. C. ROBINSON is it. A. Yes, and I added. I added to it. Q. So did you do you agree with the accuracy of that sentence? A. Yes, at the time I did, but I in addition I added to
2 3 4 5 6 7	G. C. ROBINSON same paragraph, the next sentence which begins with "Unfortunately," do you see that? A. Yes. Q. If you can, just please read that sentence to yourself, and I will ask you a question when you completed it.	1 2 3 4 5 6 7	G. C. ROBINSON is it. A. Yes, and I added. I added to it. Q. So did you do you agree with the accuracy of that sentence? A. Yes, at the time I did, but
2 3 4 5 6 7 8 9	G. C. ROBINSON same paragraph, the next sentence which begins with "Unfortunately," do you see that? A. Yes. Q. If you can, just please read that sentence to yourself, and I will ask you a question when you completed it. A. (Witness complies.)	1 2 3 4 5 6 7 8 9	G. C. ROBINSON is it. A. Yes, and I added. I added to it. Q. So did you do you agree with the accuracy of that sentence? A. Yes, at the time I did, but I in addition I added to Q. Okay. A. It.
2 3 4 5 6 7 8 9	G. C. ROBINSON same paragraph, the next sentence which begins with "Unfortunately," do you see that? A. Yes. Q. If you can, just please read that sentence to yourself, and I will ask you a question when you completed it. A. (Witness complies.) Okay.	1 2 3 4 5 6 7 8 9	G. C. ROBINSON is it. A. Yes, and I added. I added to it. Q. So did you do you agree with the accuracy of that sentence? A. Yes, at the time I did, but I in addition I added to Q. Okay. A. It. Q. You added what you added.
2 3 4 5 6 7 8 9 10	G. C. ROBINSON same paragraph, the next sentence which begins with "Unfortunately," do you see that? A. Yes. Q. If you can, just please read that sentence to yourself, and I will ask you a question when you completed it. A. (Witness complies.) Okay. Q. Do you agree with that	1 2 3 4 5 6 7 8 9 10 11	G. C. ROBINSON is it. A. Yes, and I added. I added to it. Q. So did you do you agree with the accuracy of that sentence? A. Yes, at the time I did, but I in addition I added to Q. Okay. A. It. Q. You added what you added. The record will reflect what you
2 3 4 5 6 7 8 9 10 11 12 13	G. C. ROBINSON same paragraph, the next sentence which begins with "Unfortunately," do you see that? A. Yes. Q. If you can, just please read that sentence to yourself, and I will ask you a question when you completed it. A. (Witness complies.) Okay. Q. Do you agree with that sentence?	1 2 3 4 5 6 7 8 9 10 11 12 13	G. C. ROBINSON is it. A. Yes, and I added. I added to it. Q. So did you do you agree with the accuracy of that sentence? A. Yes, at the time I did, but I in addition I added to Q. Okay. A. It. Q. You added what you added. The record will reflect what you added.
2 3 4 5 6 7 8 9 10 11 12 13 14	G. C. ROBINSON same paragraph, the next sentence which begins with "Unfortunately," do you see that? A. Yes. Q. If you can, just please read that sentence to yourself, and I will ask you a question when you completed it. A. (Witness complies.) Okay. Q. Do you agree with that sentence? MS. HARWIN: Objection to	1 2 3 4 5 6 7 8 9 10 11 12 13	G. C. ROBINSON is it.  A. Yes, and I added. I added to it.  Q. So did you do you agree with the accuracy of that sentence? A. Yes, at the time I did, but I in addition I added to Q. Okay. A. It. Q. You added what you added. The record will reflect what you added. In the complaints that you
2 3 4 5 6 7 8 9 10 11 12 13	G. C. ROBINSON same paragraph, the next sentence which begins with "Unfortunately," do you see that? A. Yes. Q. If you can, just please read that sentence to yourself, and I will ask you a question when you completed it. A. (Witness complies.) Okay. Q. Do you agree with that sentence? MS. HARWIN: Objection to the form.	1 2 3 4 5 6 7 8 9 10 11 12 13	G. C. ROBINSON is it.  A. Yes, and I added. I added to it. Q. So did you do you agree with the accuracy of that sentence? A. Yes, at the time I did, but I in addition I added to Q. Okay. A. It. Q. You added what you added. The record will reflect what you added. In the complaints that you filed in this action you cite to
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	G. C. ROBINSON same paragraph, the next sentence which begins with "Unfortunately," do you see that? A. Yes. Q. If you can, just please read that sentence to yourself, and I will ask you a question when you completed it. A. (Witness complies.) Okay. Q. Do you agree with that sentence? MS. HARWIN: Objection to the form. A. I agree with that sentence, but would also add that my future	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	G. C. ROBINSON is it.  A. Yes, and I added. I added to it.  Q. So did you do you agree with the accuracy of that sentence? A. Yes, at the time I did, but I in addition I added to Q. Okay. A. It. Q. You added what you added. The record will reflect what you added.  In the complaints that you filed in this action you cite to certain reputational damages, right? A. Yes.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	G. C. ROBINSON same paragraph, the next sentence which begins with "Unfortunately," do you see that? A. Yes. Q. If you can, just please read that sentence to yourself, and I will ask you a question when you completed it. A. (Witness complies.) Okay. Q. Do you agree with that sentence? MS. HARWIN: Objection to the form. A. I agree with that sentence, but would also add that my future had been because of this has been destroyed. My ability to obtain	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	G. C. ROBINSON is it.  A. Yes, and I added. I added to it.  Q. So did you do you agree with the accuracy of that sentence? A. Yes, at the time I did, but I in addition I added to Q. Okay. A. It. Q. You added what you added. The record will reflect what you added.  In the complaints that you filed in this action you cite to certain reputational damages, right? A. Yes. Q. Okay. Beyond what we just talked
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	G. C. ROBINSON same paragraph, the next sentence which begins with "Unfortunately," do you see that? A. Yes. Q. If you can, just please read that sentence to yourself, and I will ask you a question when you completed it. A. (Witness complies.) Okay. Q. Do you agree with that sentence? MS. HARWIN: Objection to the form. A. I agree with that sentence, but would also add that my future had been because of this has been destroyed. My ability to obtain work has been destroyed, my	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	G. C. ROBINSON is it.  A. Yes, and I added. I added to it.  Q. So did you do you agree with the accuracy of that sentence? A. Yes, at the time I did, but I in addition I added to Q. Okay. A. It. Q. You added what you added. The record will reflect what you added.  In the complaints that you filed in this action you cite to certain reputational damages, right? A. Yes. Q. Okay. Beyond what we just talked about, how has your reputation been
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	G. C. ROBINSON same paragraph, the next sentence which begins with "Unfortunately," do you see that? A. Yes. Q. If you can, just please read that sentence to yourself, and I will ask you a question when you completed it. A. (Witness complies.) Okay. Q. Do you agree with that sentence? MS. HARWIN: Objection to the form. A. I agree with that sentence, but would also add that my future had been because of this has been destroyed. My ability to obtain work has been destroyed	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	G. C. ROBINSON is it.  A. Yes, and I added. I added to it.  Q. So did you do you agree with the accuracy of that sentence? A. Yes, at the time I did, but I in addition I added to Q. Okay. A. It. Q. You added what you added. The record will reflect what you added.  In the complaints that you filed in this action you cite to certain reputational damages, right? A. Yes. Q. Okay.  Beyond what we just talked about, how has your reputation been damaged specifically?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	G. C. ROBINSON same paragraph, the next sentence which begins with "Unfortunately," do you see that? A. Yes. Q. If you can, just please read that sentence to yourself, and I will ask you a question when you completed it. A. (Witness complies.) Okay. Q. Do you agree with that sentence? MS. HARWIN: Objection to the form. A. I agree with that sentence, but would also add that my future had been because of this has been destroyed. My ability to obtain work has been destroyed because of the false accusations and	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	G. C. ROBINSON is it.  A. Yes, and I added. I added to it.  Q. So did you do you agree with the accuracy of that sentence?  A. Yes, at the time I did, but I in addition I added to Q. Okay.  A. It.  Q. You added what you added. The record will reflect what you added.  In the complaints that you filed in this action you cite to certain reputational damages, right?  A. Yes.  Q. Okay.  Beyond what we just talked about, how has your reputation been damaged specifically?  MS. HARWIN: Objection to
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	G. C. ROBINSON same paragraph, the next sentence which begins with "Unfortunately," do you see that? A. Yes. Q. If you can, just please read that sentence to yourself, and I will ask you a question when you completed it. A. (Witness complies.) Okay. Q. Do you agree with that sentence? MS. HARWIN: Objection to the form. A. I agree with that sentence, but would also add that my future had been because of this has been destroyed. My ability to obtain work has been destroyed, my reputation has been destroyed because of the false accusations and statements and retaliatory lawsuit.	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	G. C. ROBINSON is it.  A. Yes, and I added. I added to it.  Q. So did you do you agree with the accuracy of that sentence?  A. Yes, at the time I did, but I in addition I added to Q. Okay.  A. It.  Q. You added what you added. The record will reflect what you added.  In the complaints that you filed in this action you cite to certain reputational damages, right?  A. Yes.  Q. Okay.  Beyond what we just talked about, how has your reputation been damaged specifically?  MS. HARWIN: Objection to the form.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	G. C. ROBINSON same paragraph, the next sentence which begins with "Unfortunately," do you see that? A. Yes. Q. If you can, just please read that sentence to yourself, and I will ask you a question when you completed it. A. (Witness complies.) Okay. Q. Do you agree with that sentence? MS. HARWIN: Objection to the form. A. I agree with that sentence, but would also add that my future had been because of this has been destroyed. My ability to obtain work has been destroyed because of the false accusations and	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	G. C. ROBINSON is it.  A. Yes, and I added. I added to it.  Q. So did you do you agree with the accuracy of that sentence?  A. Yes, at the time I did, but I in addition I added to Q. Okay.  A. It.  Q. You added what you added. The record will reflect what you added.  In the complaints that you filed in this action you cite to certain reputational damages, right?  A. Yes.  Q. Okay.  Beyond what we just talked about, how has your reputation been damaged specifically?  MS. HARWIN: Objection to





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3 4 5 5 6 7 8 9 10 11 12 13 14 15 16 17	G. C. ROBINSON retaliatory lawsuit, the false allegations that were meant to humiliate me, ruin me. Q. Have you spoken to anyone about prospective employment who has referred to this lawsuit? MS. HARWIN: Objection to the form. A. Can you clarify in what way they would have what way Q. Sure. Have you spoken with anyone about prospective employment, following April 6, 2019, which has who has referred to Canal's State Court against you, or your commencement of this action against	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	G. C. ROBINSON my lawsuit. Q. Thank you. MR. BENNETT: I sent the second exhibit, which Paige will eventually mark as Defendant's Exhibit B. (Whereupon, ROBINSON Exhibit B, a seven-page PDF starting with Bates stamped Robinson 5114, was marked for identification, as of this date.) Q. Ms. Robinson, if you could please open it up when you get it and I will direct you to a particular aspect of it. MS. HARWIN: It has now	Page 163
19 19 20 21 22 23 4 5	Mr. De Niro?  Ms. HARWIN: Objection to the form.  A. I can't recall a specific conversation with some with somebody that I was applying for a job about this lawsuit, or Canal, or	18 19 20 21 22 23 24 25	been sent.  THE WITNESS: I will let you know when I receive it.  MR. BENNETT: Thank you.  A. I have it opened.  Q. Great.  If you can, just open it,	Page 165
3 4 5 6 7 8 9 1 10 1 11 12 13 14 15 16 17 4 18 19 20 1	G. C. ROBINSON and I am going to describe for the record.  MR. BENNETT: It is a seven-page PDF. The first page is Bates Stamped Robinson 5114.  Q. When you open it, I would like to direct your attention to the top e-mail from you to Anne Barkley. Let me know if you see that?  A. Yes.  Q. You see where it says, "Saturday, May 11, 2019?"  A. May 11, 2019, yes.  Q. So it is about a month after you resigned, correct?  A. Yes.  Q. If you look at the second paragraph of that e-mail, read that to yourself, please, it begins with "I am in the process of?"  A. Uh-huh.  Q. Do you see that?  A. Yes.	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	G. C. ROBINSON Q. It refers to you quote, "Working on a few development projects I have been writing and putting together." Do you see that? A. Yes. Q. What does that refer to? MS. HARWIN: Objection to the form. A. When I left Canal Productions, my plan was to apply business school for my MBA, and addition start my own production company. Development projects a: were a part of what I was planning on doing with my product company. Q. What does that mean, development projects? A. Development projects MS. HARWIN: Objection to the form. A. Development projects are things that I have researched or	to in re





G. C. ROBINSON  scripts that I wanted to write,  whether they were projects that were  documentaries that I had to  research. It is just about putting  scripts together and developing  for them. Ideas. That is what I was  production company.  Documentaries?  A. I wouldn't characterize  them as development projects.  Q. Okay.  I think—well, it was  production company.  Documentaries?  A. There were different types  of projects that I was looking to  projects that I was looking to  possibly do.  Did you begin any of that  work on these development projects  before. April 6, 2019?  MS. HARWIN: Objection to  the form.  MR. But i really wasn't in any  sort of phase of development just  because I didn'th was any personal  time to work on it.  Q. Okay.  MR. Documentaries  MR. But in really wasn't in any  sort of phase of development just  because I didn'th was any personal  time to work on it.		D 166		D 167
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MS. HARWIN: Objection to the form.  Q. During your employment with  Canal?  Page 168  Page 169  G. C. ROBINSON  Intervity of phase of development just obscause I didn't have any personal time to work on it.  Q. Okay.  If you can refer to pages to two through seven of Defendant's two through seven of Defendant's two.  Lambda A. Okay. Ves.  MS. HARWIN: I will note to the presentation of this to the presentation of this that seem to be spliced together in one PDF.  MR. BNNETT: There is a revising. There was another one  Page 169  A. I can't recall the exact date. I believe one of them was written after college that I was revising. There was another one  Page 169  A. I can't recall the exact date. I believe one of them was written after college that I was revising. There was another one  Page 169  A. Canal?  A. Canal?  A. Canal?  A. Canal?  A. Canal?  A. Canal?  B. G. C. ROBINSON  produced.  MR. DROGIN: So the object in so overruled.  A. What am I specifically looking at?  Q. Did you did you review pages two through seven?  A. Okay. Okay.  A. Okay. Okay.  A. Okay. Okay.  A. Okay. Okay.  A. Day one she live in New Canaan?  A. No.  Q. Does he live in New Canaan?  A. No.  MS. HARWIN: I will note friend?  MS. HARWIN: Objection to the form.  MS. HARWIN: Objection to the form.  A. He is a friend.  Q. Okay.  You can close actually, sorry, with respect to the text that you just reviewed between you and preason for that, but, yes.				
the form.  Q. During your employment with  Canal?  Page 168  Page 169  G. C. ROBINSON  that I had done a little bit of  writing on here and there when I had time. But it really wasn't in any sort of phase of development just because I didn't have any personal time to work on it.  Q. Okay.  If you can refer to pages to two through seven of Defendant's  Exhibit B.  A. You said two through seven?  A. Okay. Okay.  A. Okay. Okay.  A. Okay. Okay.  C. Does he live in New Canaan?  A. No.  MS. HARWIN: I will note for the record that we object for the record that we object to that seem to be spliced together in one PDF.  MR. BENNETT: There is a revising. There was another one  Page 169  Page 169  R. C. ROBINSON produced. MR. DROGIN: So the objection is overruled. A. What am I specifically looking at? Q. Did you did you review pages two through seven? A. Okay. Okay.  Q. Who is Brian Zach? A. Brian is a friend of mine. Q. Does he live in New Canaan? A. No.  Does is he a friend or a romantic something more than a friend? MS. HARWIN: Objection to the form. A. He is a friend. Q. Okay.  You can close actually, sorry, with respect to the text that you just reviewed between you and Brian Zach, do you recall when you				
Page 168  Page 168  Page 168  Page 168  Page 169  Canal?  Page 168  Page 169  Canal?  Page 168  Page 169  Canal?  Page 169  Page 169  Canal?  Page 169  Page 169  Page 169  Canal?  Page 169  Page 169  Page 169  Canal?  Page 169  Canal?  Page 169				
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1 G. C. ROBINSON 2 that I had done a little bit of 3 writing on here and there when I had 4 time. But it really wasn't in any 5 sort of phase of development just 6 because I didn't have any personal 7 time to work on it. 8 Q. Okay. 9 If you can refer to pages 10 two through seven of Defendant's 11 Exhibit B. 12 A. You said two through seven? 13 Q. Yes. 14 A. Okay. I am on two. Page 15 two. 16 MS. HARWIN: I will note 16 MS. HARWIN: I will note 17 for the record that we object 18 to the presentation of this 19 exhibit which seems to be 20 multiple separate documents 21 MR. BENNETT: There is a 22 reason for that, but, yes. 24 Brian Zach, do you review 25 produced. 3 MR. DROGIN: So the 4 objection is overruled. 5 MR. DROGIN: So the 4 objection is overruled. 5 A. What am I specifically 6 looking at? 7 Q. Did you did you review 7 pages two through seven? 8 pages two through seven? 9 A. Okay. Okay. 10 Q. Who is Brian Zach? A. Brian is a friend of mine. 11 Q. Does he live in New Canaan? 12 Q. Does he live in New Canaan? 13 Q. Yes. 14 Q. Does is he a friend or a 15 romantic something more than a 16 friend? 17 MS. HARWIN: Objection to 18 to the presentation of this 18 the form. 19 exhibit which seems to be 19 A. He is a friend. 20 Q. Okay. 21 that seem to be spliced 22 together in one PDF. 23 MR. BENNETT: There is a 24 gou just reviewed between you and 24 reason for that, but, yes.	25	anal?	25	revising. There was another one
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5 sort of phase of development just 6 because I didn't have any personal 7 time to work on it. 7 Q. Did you did you review 8 Q. Okay. 8 pages two through seven? 9 If you can refer to pages 10 two through seven of Defendant's 11 Exhibit B. 12 A. You said two through seven? 13 Q. Yes. 14 A. Okay. I am on two. Page 15 two. 16 MS. HARWIN: I will note 17 for the record that we object 18 to the presentation of this 19 exhibit which seems to be 20 multiple separate documents 21 together in one PDF. 22 sorry, with respect to the text that 24 reason for that, but, yes. 25 Did you did you review 26 pages two through seven? 27 Q. Did you did you review 28 pages two through seven? 29 A. Okay. Okay. 20 Who is Brian Zach? 20 Who is Brian Zach? 21 A. Brian is a friend of mine. 20 Does is he a friend or a 21 romantic something more than a 22 friend? 23 you can close actually, 24 sorry, with respect to the text that 25 sorry, with respect to the text that 26 you just reviewed between you and 27 grian I am I specifically 28 looking at? 29 Q. Did you did you review 29 A. Okay. 20 Who is Brian Zach, do you recall when you				
because I didn't have any personal time to work on it.  Q. Okay. If you can refer to pages two through seven? If you can refer to pages two through seven?  A. Okay. Okay.  Exhibit B.  A. You said two through seven?  Q. Who is Brian Zach?  A. Brian is a friend of mine.  Q. Does he live in New Canaan?  A. No.  A. Okay. I am on two. Page two.  MS. HARWIN: I will note for the record that we object to the presentation of this exhibit which seems to be multiple separate documents together in one PDF.  MR. BENNETT: There is a  Looking at?  Q. Did you did you review pages two through seven? A. Okay. Okay.  D. Does he live in New Canaan?  A. No.  MR. BENNETT: There is a  Looking at?  Q. Did you did you review pages two through seven?  A. Okay. Okay.  A. Does is he a friend or a  romantic something more than a friend?  MS. HARWIN: Objection to the form.  A. He is a friend. Q. Okay.  You can close actually, sorry, with respect to the text that you just reviewed between you and Brian Zach, do you recall when you				
time to work on it.  Q. Okay.  If you can refer to pages  two through seven of Defendant's  Exhibit B.  A. You said two through seven?  A. Okay. Okay.  Q. Who is Brian Zach?  A. Brian is a friend of mine.  Q. Does he live in New Canaan?  A. No.  A. Okay. I am on two. Page  two.  MS. HARWIN: I will note  for the record that we object  for the presentation of this  to the presentation of this  multiple separate documents  multiple separate documents  MR. BENNETT: There is a  MR. BENNETT: There is a  MR. BENNETT: There is a  MR. Bein is a fried of mine.  Q. Does he live in New Canaan?  A. No.  Q. Does is he a friend or a  romantic something more than a  friend?  MS. HARWIN: Objection to  the form.  A. He is a friend.  Q. Okay.  You can close actually,  sorry, with respect to the text that  you just reviewed between you and  Brian Zach, do you receile work in the pages two through seven?  A. Okay. Okay.  Vou can close actually,  sorry, with respect to the text that  you just reviewed between you and  Brian Zach, do you recall when you				
8 Q. Okay. 9 If you can refer to pages 10 two through seven of Defendant's 11 Exhibit B. 12 A. You said two through seven? 13 Q. Yes. 14 A. Okay. I am on two. Page 15 two. 16 MS. HARWIN: I will note 17 for the record that we object 18 exhibit which seems to be 19 exhibit which seems to be 20 multiple separate documents 21 that seem to be spliced 22 mR. BENNETT: There is a 24 reason for that, but, yes. 20 Who is Brian Zach? 21 A. Okay. Okay. 21 Opes he live in New Canaan? 22 Does he live in New Canaan? 23 MR. BENNETT: There is a 24 Brian Zach, do you recall when you				
9 If you can refer to pages 10 two through seven of Defendant's 11 Exhibit B. 12 A. You said two through seven? 13 Q. Yes. 14 A. Okay. I am on two. Page 15 two. 16 MS. HARWIN: I will note 17 for the record that we object 18 to the presentation of this 19 exhibit which seems to be 20 multiple separate documents 21 Together in one PDF. 22 Together in one PDF. 23 MR. BENNETT: There is a 24 reason for that, but, yes. 26 Who is Brian Zach? 20 Who is Brian Zach? 20 Does he live in New Canaan? 21 A. No. 22 Who is Brian Zach? 24 Who is Brian Zach? 24 A. Okay. Okay. 21 A. Brian is a friend of mine. 24 Who is Brian Zach? 24 A. Okay. Okay. 25 A. Brian is a friend of mine. 26 MS. HARWIN: I will note 27 MS. HARWIN: Objection to 28 A. He is a friend of mine. 29 A. No. 21 You can close actually, sorry, with respect to the text that you just reviewed between you and Brian Zach, do you recall when you	8	Q. Okay.	8	
two through seven of Defendant's  Exhibit B.  A. You said two through seven?  Q. Yes.  A. Okay. I am on two. Page  two.  MS. HARWIN: I will note for the record that we object to the presentation of this exhibit which seems to be multiple separate documents  MR. BENNETT: There is a reason for that, but, yes.  10 Q. Who is Brian Zach? A. Brian is a friend of mine.  Q. Does he live in New Canaan?  A. No.  Q. Does is he a friend or a romantic something more than a friend?  MS. HARWIN: Objection to the form.  A. He is a friend. Q. Okay. You can close actually, sorry, with respect to the text that you just reviewed between you and Brian Zach, do you recall when you			9	
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Q. Yes.  13 A. No.  14 A. Okay. I am on two. Page 15 two.  16 MS. HARWIN: I will note 17 for the record that we object 18 to the presentation of this 19 exhibit which seems to be 20 multiple separate documents 21 that seem to be spliced 22 together in one PDF. 23 MR. BENNETT: There is a 24 reason for that, but, yes.  13 A. No.  Q. Does is he a friend or a romantic something more than a 16 friend? 17 MS. HARWIN: Objection to 18 the form. 19 A. He is a friend. Q. Okay. You can close actually, 20 sorry, with respect to the text that 21 you just reviewed between you and 24 Brian Zach, do you recall when you			11	A. Brian is a friend of mine.
A. Okay. I am on two. Page two.  MS. HARWIN: I will note for the record that we object to the presentation of this exhibit which seems to be multiple separate documents that seem to be spliced together in one PDF. MR. BENNETT: There is a romantic something more than a friend?  MS. HARWIN: Objection to the form. A. He is a friend. Q. Okay. You can close actually, sorry, with respect to the text that you just reviewed between you and Brian Zach, do you recall when you	12	A. You said two through seven?		Q. Does he live in New Canaan?
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16 MS. HARWIN: I will note 17 for the record that we object 18 to the presentation of this 19 exhibit which seems to be 20 multiple separate documents 21 that seem to be spliced 22 together in one PDF. 23 MR. BENNETT: There is a 24 reason for that, but, yes. 26 MS. HARWIN: Objection to 18 the form. 29 A. He is a friend. 20 Q. Okay. 21 You can close actually, sorry, with respect to the text that 23 you just reviewed between you and 24 Brian Zach, do you recall when you		A. Okay. I am on two. Page		Q. Does is he a friend or a
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MR. BENNETT: There is a you just reviewed between you and reason for that, but, yes. 23 you just reviewed between you and Brian Zach, do you recall when you		that seem to be spliced	21	You can close actually,
reason for that, but, yes. 24 Brian Zach, do you recall when you	21			
	21 22	together in one PDF.		sorry, with respect to the text that
25 It was because of how it was 25 retained or first met with Sanford	21 22 23	together in one PDF. MR. BENNETT: There is a	23	sorry, with respect to the text that you just reviewed between you and
	21 22 23 24	together in one PDF.  MR. BENNETT: There is a reason for that, but, yes.	23 24	sorry, with respect to the text that you just reviewed between you and Brian Zach, do you recall when you





	Down 170		Daws 171
	Page 170		Page 171
1	G. C. ROBINSON	1	G. C. ROBINSON
2 3	Heisler? I am not asking for	2 3	Was.
4	anything that you discussed with	4	Q. What type of services did
	them but a date?		Canal offer?
5 6	MS. HARWIN: Objection to	5 6	MS. HARWIN: Objection to
7	the form. A. I can't recall.	7	the form.  A. Services related to Bob, to
8	Q. You can close that out.	8	his businesses, his personal life, I
9	MR. BENNETT: I am going	9	his businesses, his personal file, i
10	to circulate another exhibit.	10	Q. Would you agree that Canal
11	You can send that over to	11	was a loan out company for the
12	your client. We are now	12	acting services of Robert De Niro?
13	going to get into the exhibit	13	MS. HARWIN: Objection to
14	this second.	14	the form.
15	Q. Ms. Robinson, you commenced	15	A. I don't know if I would
16	employment with Canal in 2008, is	16	characterize it that way. I think
17	that correct?	17	that it was I think that did
18	A. I started my employment	18	Q. Let me try to clarify the
19	with Canal in 2008.	19	question for you, Ms. Robinson.
20	Q. When you started with	20	Did Mr. De Niro offer his
21	Canal, what type of business was it?	21	acting services through Canal, even
22	MS. HARWIN: Objection to	22	though Canal might have done other
23	the form.	23	things?
24	A. I don't know specifically	24	MS. HARWIN: Objection to
25	what type of business or Canal	25	the form.
	Page 172		Page 173
1	Page 172 G. C. ROBINSON	1	Page 173 G. C. ROBINSON
1 2		1 2	
	G. C. ROBINSON	1	G. C. ROBINSON
2 3 4	G. C. ROBINSON A. I believe at times it did.	2 3 4	G. C. ROBINSON who you were replacing specifically,
2 3 4 5	G. C. ROBINSON A. I believe at times it did. Q. Okay.	2 3 4 5	G. C. ROBINSON who you were replacing specifically, or who it was contemplated that you
2 3 4 5 6	G. C. ROBINSON A. I believe at times it did. Q. Okay. Canal was Mr. De Niro, and Mr. De Niro was Canal, would you agree with that?	2 3 4 5 6	G. C. ROBINSON who you were replacing specifically, or who it was contemplated that you might replace? MS. HARWIN: Objection to the form.
2 3 4 5 6 7	G. C. ROBINSON A. I believe at times it did. Q. Okay. Canal was Mr. De Niro, and Mr. De Niro was Canal, would you agree with that? MS. HARWIN: Objection to	2 3 4 5 6 7	G. C. ROBINSON who you were replacing specifically, or who it was contemplated that you might replace? MS. HARWIN: Objection to the form. A. Yes.
2 3 4 5 6 7 8	G. C. ROBINSON A. I believe at times it did. Q. Okay. Canal was Mr. De Niro, and Mr. De Niro was Canal, would you agree with that? MS. HARWIN: Objection to the form.	2 3 4 5 6 7 8	G. C. ROBINSON who you were replacing specifically, or who it was contemplated that you might replace? MS. HARWIN: Objection to the form. A. Yes. Q. Who?
2 3 4 5 6 7 8	G. C. ROBINSON A. I believe at times it did. Q. Okay. Canal was Mr. De Niro, and Mr. De Niro was Canal, would you agree with that? MS. HARWIN: Objection to the form. A. Yes, it was Bob's business	2 3 4 5 6 7 8	G. C. ROBINSON who you were replacing specifically, or who it was contemplated that you might replace? MS. HARWIN: Objection to the form. A. Yes. Q. Who? A. I was interviewed by Lauren
2 3 4 5 6 7 8 9	G. C. ROBINSON A. I believe at times it did. Q. Okay. Canal was Mr. De Niro, and Mr. De Niro was Canal, would you agree with that? MS. HARWIN: Objection to the form. A. Yes, it was Bob's business and personal.	2 3 4 5 6 7 8 9	G. C. ROBINSON who you were replacing specifically, or who it was contemplated that you might replace? MS. HARWIN: Objection to the form. A. Yes. Q. Who? A. I was interviewed by Lauren Hertz, Bob's executive assistant at
2 3 4 5 6 7 8 9 10	G. C. ROBINSON A. I believe at times it did. Q. Okay. Canal was Mr. De Niro, and Mr. De Niro was Canal, would you agree with that? MS. HARWIN: Objection to the form. A. Yes, it was Bob's business and personal. Q. What led you to first start	2 3 4 5 6 7 8 9 10	G. C. ROBINSON who you were replacing specifically, or who it was contemplated that you might replace? MS. HARWIN: Objection to the form. A. Yes. Q. Who? A. I was interviewed by Lauren Hertz, Bob's executive assistant at the time to replace her as she was
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	Page 174		Page 175
4			-
1	G. C. ROBINSON	1	G. C. ROBINSON
2	A. I met with the executive	2	Q. So ballpark, you are around
3	assistants, Lauren Hertz, Jessie	3	25 years of age when you start
4	Spellman (ph), and Michael Kaplan,	4	working with Canal, is that fair?
5	and I believe I also met with	5	A. Yes, I believe so.
6	Michael Weber.	6	Q. Okay.
7	Q. Did you meet with Bob?	7	You are working with Mr. De
8	A. I met with Bob, and in	8	Niro, one of the most well-known
9	addition, I also met with	9	actores in history, right?
10	who signed off on on me	10	MS. HARWIN: Objection to
11	being hired.	11	the form.
12	Q. Did you interview with Jane	12	A. I worked for Bob.
13	Rosenthal (ph)?	13	Q. Okay.
14	A. I had met with her, I	14	Did in light of your
15	believe, in I had met with her,	15	minor at St. Lawrence, was it
16	but not in connection with the	16	exciting for you, with the prospect
17	position at Canal Productions.	17	of working alongside Mr. De Niro?
18	Q. What was it in connection	18	MS. HARWIN: Objection to
19	with?	19	the form.
20	A. A possible job at Tribeca	20	A. I was excited to continue
21	in the in film production.	21	or to start a foundation for my
22	Q. And that was before the	22	career in in working in the
23	offer from Canal Productions was	23	entertainment industry and film.
24	extended to you?	24	Q. I don't want to interrupt
25	A. Yes.	25	you. Are you done?
23	11. 105.	23	you. The you dolle.
	Page 176		Page 177
1	G. C. ROBINSON	1	G. C. ROBINSON
2	A. Yeah.	2	MS. HARWIN: Objection to
3	Q. Okay.	3	the form.
4	So the fact that you were	4	A. Not that I am aware of.
5	working alongside Mr. De Niro didn't	5	Q. What were your job
6	mean anything?	6	responsibilities?
7	MS. HARWIN: Objection to	7	MS. HARWIN: Objection to
8	the form.	8	the form.
9	A. I wouldn't characterize it	9	Q. Withdrawn.
10	that way. I think that I just I	10	During the first year you
11	wouldn't characterize it that way.	11	were employed by Canal, what were
12	Q. How would you characterize	12	your job responsibilities?
13	it?	13	A. My job responsibilities
14	MS. HARWIN: Objection to	14	included handling Bob's schedule,
15	the form.	15	messages, a birthday list in and
16	A. I think I think with the	16	picking out gifts, very large
17	job with Bob and being in the	17	Christmas gifts and picking out
18	entertainment industry, I was	18	gifts.
19	excited about the start of my career	19	In addition, there was a
20	in the film industry. It	20	portion of being on call for Bob
21	incorporated not only working for	21	which I mean, handling other sort
22	somebody in the film industry, but	22	of personal items for him. Whatever
23	also working in that industry.	23	he asked or directed me to do is
	O Did vou supervise anyone	24	what I did
24 25	Q. Did you supervise anyone during your first year on the job?	24 25	what I did. Q. You started off with an





	Page 178		Page 179
1	G. C. ROBINSON	1	G. C. ROBINSON
2	annual salary of 95,000, is that	2	I was Bob's only executive assistant
3	correct?	3	for much of that time, I worked
4	A. I don't believe that is	4	while I was away as well. So there
5	correct.	5	were times where I worked while I
6	Q. What do you think it	6	was away in LA or other locations.
7	started out as?	7	I can't recall exactly during those
8	MS. HARWIN: Objection to	8	dates where I would have
9	the form.	9	additionally been working from.
10	A. I can't recall what exactly	10	Q. Okay.
11	my starting salary was.	11	Do you know when Dan Harvey
12	Q. Okay.	12	commenced employment with Canal?
13	Between the first day that	13	MS. HARWIN: Objection to
14	you started with Canal, and October	14	the form.
15	of 2012, where did you physically	15	A. No.
16	perform the job?	16	Q. Do you know when Kaplan
17	MS. HARWIN: Objection to	17	commenced employment with Canal?
18	the form.	18	MS. HARWIN: Objection to
19	A. From I need to clarify,	19	the form.
20	from the beginning when I started in	20	A. I don't know when Michael
21	February 2008 to October of 2013?	21	Kaplan started at Canal.
22	Q. 2012?	22	Q. Did Mr. Kaplan supervise
23	A. Oh, 2012. Mainly the	23	you when you began working for
24	office at Canal Productions, but	24	Canal?
25	there were additional times because	25	MS. HARWIN: Objection to
			<u> </u>
	Page 180		
	rage 100		Page 181
1	G. C. ROBINSON	1	Page 181 G. C. ROBINSON
2		2	G. C. ROBINSON opening the exhibit.
	G. C. ROBINSON	2 3	G. C. ROBINSON
2 3 4	G. C. ROBINSON the form. A. Yes. In in some ways, he did.	2 3 4	G. C. ROBINSON opening the exhibit.  MR. BENNETT: Yeah. That is fine.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	G. C. ROBINSON the form. A. Yes. In in some ways, he did. Q. In what ways? A. He, like Jesse Spellman (ph) and Michael Weber were senior to me, and they would direct me on how things were handled or done. That is what comes to mind at this moment. Q. Okay. There is a new exhibit. If you could just open it, please. MR. BENNETT: For the record it is a PDF, 20 pages. The file name is P13908. (Whereupon, ROBINSON	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	G. C. ROBINSON opening the exhibit. MR. BENNETT: Yeah. That is fine. MS. HARWIN: One minute. (Whereupon, a recess was taken at this time.) Q. Did you see that new file? A. I did. It is quite it is a lot of pages. 20. Is there something that you would like to direct me to? Q. Absolutely. We are going to look at pages one and two. So specifically I would like you to look at the bottom of page one. It is an e-mail, dated April 8, 2011, at 11:05 a.m., from you to Bosswick.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	G. C. ROBINSON the form. A. Yes. In in some ways, he did. Q. In what ways? A. He, like Jesse Spellman (ph) and Michael Weber were senior to me, and they would direct me on how things were handled or done. That is what comes to mind at this moment. Q. Okay. There is a new exhibit. If you could just open it, please. MR. BENNETT: For the record it is a PDF, 20 pages. The file name is P13908. (Whereupon, ROBINSON Exhibit C, a 20-page PDF, file name P13908, was marked for identification, as of this date.) MS. HARWIN: If we could	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	G. C. ROBINSON opening the exhibit.  MR. BENNETT: Yeah. That is fine.  MS. HARWIN: One minute. (Whereupon, a recess was taken at this time.) Q. Did you see that new file? A. I did. It is quite it is a lot of pages. 20. Is there something that you would like to direct me to? Q. Absolutely. We are going to look at pages one and two. So specifically I would like you to look at the bottom of page one. It is an e-mail, dated April 8, 2011, at 11:05 a.m., from you to Bosswick.  Do you see that? A. Yes. Q. And if you I am going to direct your attention to the third paragraph which starts with, "As for
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	G. C. ROBINSON the form. A. Yes. In in some ways, he did. Q. In what ways? A. He, like Jesse Spellman (ph) and Michael Weber were senior to me, and they would direct me on how things were handled or done. That is what comes to mind at this moment. Q. Okay. There is a new exhibit. If you could just open it, please. MR. BENNETT: For the record it is a PDF, 20 pages. The file name is P13908. (Whereupon, ROBINSON Exhibit C, a 20-page PDF, file name P13908, was marked for identification, as of this date.)	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	G. C. ROBINSON opening the exhibit. MR. BENNETT: Yeah. That is fine. MS. HARWIN: One minute. (Whereupon, a recess was taken at this time.) Q. Did you see that new file? A. I did. It is quite it is a lot of pages. 20. Is there something that you would like to direct me to? Q. Absolutely. We are going to look at pages one and two. So specifically I would like you to look at the bottom of page one. It is an e-mail, dated April 8, 2011, at 11:05 a.m., from you to Bosswick. Do you see that? A. Yes. Q. And if you I am going to direct your attention to the third





	Page 182		Page 183
1	G. C. ROBINSON	1	G. C. ROBINSON
1 2		2	
3	A. Yes.	3	the form.
	Q. And just read that whole		A. Bob produced them through
4	paragraph to yourself, please.	4	Tribeca Productions.
5	A. (Witness complies).	5	Q. But Canal did not, correct?
6	Yes, I read it.	6	MS. HARWIN: Objection to
7	Q. What was the change to your	7	the form.
8	title that you are referring to	8	A. I can't recall if they were
9	here?	9	ever listed as a company that
10	A. My title was changed to	10	produced films.
11	director of production.	11	Q. Okay.
12	Q. Why was it changed?	12	So your title was being
13	MS. HARWIN: Objection to	13	changed following, and that was in
14	the form.	14	response to the conversation that
15	A. I had spoken to Bob,	15	you just explained to me with Mr. De
16	probably starting in 2010, about	16	Niro, correct?
17	wanting to focus my career on film	17	A. Yes. We had multiple
18	production, and he and I had	18	conversations about it.
19	multiple discussions on that I could	19	Q. And if you look down at the
20	continue my career at Canal and	20	paragraph below that, it starts with
21	Tribeca working on film production	21	"We will also be looking."
22	instead of moving on from being his	22	Do you see that?
23	executive assistant.	23	A. Yes.
24	Q. Did Canal produce films?	24	Q. It refers to hiring an
25	MS. HARWIN: Objection to	25	assistant, correct?
	Page 184		Dama 10F
	1age 104		Page 185
1	G. C. ROBINSON	1	G. C. ROBINSON
1 2		1 2	
	G. C. ROBINSON	1	G. C. ROBINSON leaving?
2	G. C. ROBINSON A. Yes. Q. Now Amelia started in	2	G. C. ROBINSON
2 3	G. C. ROBINSON A. Yes. Q. Now Amelia started in February of 2012, does that sound	2 3	G. C. ROBINSON leaving? MS. HARWIN: Objection to the form.
2 3 4	G. C. ROBINSON A. Yes. Q. Now Amelia started in February of 2012, does that sound right to you?	2 3 4	G. C. ROBINSON leaving? MS. HARWIN: Objection to the form. A. No, that is not correct.
2 3 4 5	G. C. ROBINSON A. Yes. Q. Now Amelia started in February of 2012, does that sound	2 3 4 5	G. C. ROBINSON leaving? MS. HARWIN: Objection to the form. A. No, that is not correct. Q. So you were an assistant at
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	G. C. ROBINSON A. Yes. Q. Now Amelia started in February of 2012, does that sound right to you? MS. HARWIN: Objection to the form. A. I can't recall when she started at Canal Productions. Q. Do you know who you are referring to here when you say that you are looking to hire an assistant this summer? MS. HARWIN: Objection to the form. A. I believe it is in reference to finding an assistant to replace me. Q. To replace you? A. Yes. Q. So you are informing Mr. Bosswick that your title is being	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	G. C. ROBINSON leaving?  MS. HARWIN: Objection to the form.  A. No, that is not correct. Q. So you were an assistant at the time, you were moved up to director of production, and you are hiring an assistant to replace your old position, is that correct?  MS. HARWIN: Objection to the form.  A. I believe it is in reference of replacing the since I was moving up to director of production and handling production items, which is what Bob and I discussed, we were replacing or Canal and Bob were replacing the executive assistant position. And that is what that is in reference to.





	Dame 100		Dama 107
	Page 186		Page 187
1	G. C. ROBINSON	1	G. C. ROBINSON
2	sound right that Amelia was hired in	2	specifically hired at Canal
3	2012?	3	Productions.
4	MS. HARWIN: Objection to	4	Q. At some point she comes on
5	the form.	5	to Canal in a full-time capacity, is
6	A. Again, I can't recall	6	that right?
7	exactly when Amelia Brain was hired.	7	A. Yes.
8	Q. I am not asking for	8	Q. When it came to the
9	exactly. I am just looking for the	9	decision to extend a salary to Ms.
10	year. Does 2012 sound right?	10	Brain for her full-time position,
11	MS. HARWIN: Objection to	11	how was the salary determination
12	the form.	12	arrived at?
13	A. No, I don't believe that	13 14	MS. HARWIN: Objection to
14 15	sounds correct. Q. Whenever Ms. Brain was	15	the form.
	•		A. I can't exactly recall
16 17	hired, why was she hired?	16 17	except that any salaries or amounts
18	MS. HARWIN: Objection to the form.	18	were approved by by Bob.
19	A. From what I can recall, she	19	Q. Right. Would you have had that conversation with Mr. De Niro
20	was hired to help out the office.	20	or someone else?
21	She began working hours here and	21	MS. HARWIN: Objection to
22	there while she was also working for	22	the form.
23	the Tribeca Grill, and I believe her	23	A. I can't recall a specific
24	hours continued to increase. I	24	conversation with him.
25	don't know exactly when she was	25	Q. When Amelia Brain came on
20	don't know exactly when she was		Q. When I thicke Brain came on
	Page 188		Page 189
1	G. C. ROBINSON	1	G. C. ROBINSON
2	to work at Canal, did you or Mr.	2	office with miscellaneous random
3	Kaplan have the authority to make an	3	things and when Bob asked for work
4	offer of employment to a prospective	4	to be done.
5	new hire without consulting with Mr.	5	Q. So the answer to the
6	De Niro?	6	question is yes I think?
7	MS. HARWIN: Objection to	7	MS. HARWIN: Objection to
8	the form.	8	the form.
9	A. No. Bob would have to have	9	Q. You did supervise her?
10	approval for hiring of employees at	10	A. I mean, at times at
11	Canal Productions.	11	times, but it wasn't something that
12	Q. Did you interview Ms.	12	was consistent. The job itself was
13	Brain?	13	again what Bob needed or what Bob
14	MS. HARWIN: Objection to	14	wanted done. And at times I would
15	the form.	15	be a middleman passing along, you
16	A. I can't recall ever	16	know, what Bob wanted.
17	interviewing Amelia Brain.	17	Q. Okay.
18 19	Q. Once Amelia starts working	18 19	Do you recall who assigned
20	with Canal, did you supervise her?	20	her work duties?
21	MS. HARWIN: Objection to the form.	21	MS. HARWIN: Objection to the form.
22	A. I believe at times there	22	the form.  A. I think that we all had a
23	were things where I passed along	23	team effort in trying to get
24	what Bob wanted to do, same as	24	everything done for what Bob was
25	Michael Kaplan. She helped out the	25	requesting and directing to be done.
	Titoliuoi ixupiuli. Olio noipou out ilio	-0	requesting and anothing to be done.



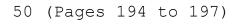


Page 190  G. C. ROBINSON  Q. Who are you referring to, when you say, "team effort"?  A. Team effort, myself, Michael Kaplan, Amelia, people who were in the office. Q. Right. So the question was focused on who is assigning work duties to Ms. Brain. She is not  Page  G. C. ROBINSON provide constructive feedback to her regarding her performance?  MS. HARWIN: Objection to the form. A. Can repeat the question? Sorry. Q. When it comes to Ms. Brain's performance of her work	191
Q. Who are you referring to, when you say, "team effort"?  A. Team effort, myself, Michael Kaplan, Amelia, people who were in the office. Q. Right. So the question was focused on who is assigning work  2 provide constructive feedback to her regarding her performance? MS. HARWIN: Objection to the form. A. Can repeat the question? Sorry. Q. When it comes to Ms.	
when you say, "team effort"?  A. Team effort, myself,  Michael Kaplan, Amelia, people who  were in the office.  Q. Right. So the question was  focused on who is assigning work  3 regarding her performance?  MS. HARWIN: Objection to  the form.  A. Can repeat the question?  Sorry.  Q. When it comes to Ms.	
4 A. Team effort, myself, 5 Michael Kaplan, Amelia, people who 6 were in the office. 7 Q. Right. So the question was 8 focused on who is assigning work 9 A. Team effort, myself, 5 MS. HARWIN: Objection to 6 the form. 6 A. Can repeat the question? 7 Sorry. 8 Q. When it comes to Ms.	
5 Michael Kaplan, Amelia, people who 6 were in the office. 7 Q. Right. So the question was 8 focused on who is assigning work 5 the form. 6 A. Can repeat the question? 7 Sorry. 8 Q. When it comes to Ms.	
6 were in the office. 6 A. Can repeat the question? 7 Q. Right. So the question was 8 focused on who is assigning work 8 Q. When it comes to Ms.	
7 Q. Right. So the question was 8 Focused on who is assigning work 8 Q. When it comes to Ms.	
8 focused on who is assigning work 8 Q. When it comes to Ms.	
8 focused on who is assigning work 8 Q. When it comes to Ms.	
10 assigning work duties to herself. 10 duties, did you ever evaluate her or	
11 Is it you and Mr. Kaplan 11 provide constructive feedback about	
who is referring work duties to her, 12 it?	
or is it someone else? 13 MS. HARWIN: Objection to	
14 MS. HARWIN: Objection to 14 the form.	
15 the form. 15 A. No. I can't recall a time	
16 A. It was a combination of 16 when I did.	
17 Bob, There were things that 17 Q. Did you ever provide her	
18 I passed along that needed to be 18 with information about compensation	
done for Bob, same with Michael 19 issues?	
20 Kaplan, to Amelia. It was just work 20 MS. HARWIN: Objection to	
that needed to be done. I don't 21 the form.	
25 Q. Did you ever evaluate or 25 benefits or pay?	
Page 192 Page	193
1 G. C. ROBINSON 1 G. C. ROBINSON	
2 A. Not that I can recall. 2 MS. HARWIN: Objection to	
3 Q. Who did? 3 the form.	
4 MS. HARWIN: Objection to 4 A. I can't recall how she	
5 the form. 5 would have known how she was what	
6 A. Can you clarify who did 6 she was earning. I am I know	
7 what? 7 that in the beginning of her	
8 Q. Sure. 8 employment she would send the hours	
9 I am just trying to 9 that she had worked, and they would	
10 understand. Ms. Brain comes on 10 be sent to Burton to be paid for the	
11 working as an executive assistant 11 hours that she worked.	
working as an executive assistant  12 working for Canal, correct?  12 Q. As far as you recall, she	
13 MS. HARWIN: Objection to 13 sent e-mails directly to Burton?	
the form. 14 A. I believe she either sent	
15 A. No, I wouldn't characterize 15 them to me and Michael, or just me	
, , , , , , , , , , , , , , , , , , ,	
21 performing work, correct? 21 MS. HARWIN: Objection to	
22 A. Yes. 22 the form.	
Q. As far as you are aware,	
24 how does she know what she is 24 Q. Did you ever provide Amelia	
25 earning? 25 with any information about	





	Page 194		Page 195
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	G. C. ROBINSON vacations, holidays or office closures?  A. At times MS. HARWIN: Objection to the form.  A. At times, I believe, I did. Q. Okay. And other times, are you aware of anyone else who did? MS. HARWIN: Objection to the form.  A. We received e-mails from Tribeca HR with the office closures. Q. Okay. Do you ever recall withdrawn. We can refer to page three of that same exhibit, please. This is an e-mail at the top. Just let me know when you see it. It is dated September 13, 2012, at 7:55 a.m. Do you see that?	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	G. C. ROBINSON Q. If you can, please just review the e-mail to yourself, and I am going to ask you some questions. A. (Witness complies).    I have read it. Q. So tell me if I am wrong. In this e-mail you are trying to explain to Mr. De Niro why your salary should go up to 190, among perhaps other things, is that fair?    MS. HARWIN: Objection to the form. A. We had been in discussion about a raise. Q. Okay.    MR. BENNETT: Can you read the question back?    (Whereupon, the requested portion was read back by the reporter:    Q: So tell me if I am wrong. In this e-mail you are trying to explain to Mr.
25	A. Yes.	25	De Niro why your salary
	Page 196		Page 197
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	G. C. ROBINSON should go up to 190, among perhaps other things, is that fair?)  MS. HARWIN: Objection to the form.  A. In this conversation, we had been discussing a raise the conversation about a raise and bonus.  Q. And the raise would be up to 190, correct?  MS. HARWIN: Objection to the form.  A. In this specific e-mail I believe so.  Q. I am not referring to any other e-mail. That is my point. If we can try to confine your answers to the questions that I am asking, this will go faster. This is the one we are looking at right now. Okay?  If you can please, I would like you to look at the paragraph	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	G. C. ROBINSON that begins with "In the office."    Do you see that? A. Yes, I see that. Q. And it seems to be that you are explaining to Mr. De Niro why you don't think giving out performance-based bonuses is a good idea for yourself or Canal personnel, correct?    MS. HARWIN: Objection to form. A. Yes. Q. Okay.    And in this if you look at I don't know what sentence it is. It starts with, "In the case of Michael."    Do you see that? It is like the third line down. A. Yes. Q. That is Kaplan, right? A. Yes. Q. "I have given him a little extra bonus when he worked hard





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1		1	
1	G. C. ROBINSON	1	G. C. ROBINSON
2	during the festival," et cetera, correct?	2	would be a discussion between Bob
4	MS. HARWIN: Objection to	4	and myself, or Mark Bosswick and
5	the form.	5	Bob. I did not have the approval to actually make decisions on who got
6	Q. Do you see that?	6	bonuses. There would be at this
7	A. Yes, that is what it says.	7	time, there would be a suggestion,
8	Q. Okay.	8	but it would be Bob's decision of
9	So at this point in time,	9	what he would like to do.
10	September 2012, it seems like	10	Q. So you would make
11	according to this e-mail you are	11	recommendations, correct?
12	making a decisions as to whether Mr.	12	MS. HARWIN: Objection to
13	Kaplan receives a bonus, or at a	13	the form.
14	minimum, that you are recommending	14	A. In this case, yes, I did.
15	that to Mr. De Niro, is that fair?	15	Q. Okay.
16	MS. HARWIN: Objection to	16	And as far as you recall,
17	the form.	17	did Mr. De Niro adopt your
18	A. I don't know if I would	18	recommendations?
19	characterize it that way.	19	MS. HARWIN: Objection to
20	Q. How would you characterize	20	the form.
21	it?	21	A. Are you talking about this
22	A. These are all things that	22	specific paragraph and whether he
23	Bob would have to approve if they	23	did or not?
24	if Michael was given more of a bonus	24	Q. It is referring to the past
25	or something after the festival. It	25	tense. So I am guessing that Mr.
	Page 200		
1		1	
1	G. C. ROBINSON	1	G. C. ROBINSON
2	Kaplan was given this extra bonus	2	receiving \$150,000 per year from
3	that you referred, no?	3	Canal?
4 5	MS. HARWIN: Objection to the form.	4 5	MS. HARWIN: Objection to the form.
6	A. I believe he was, with	6	A. I can't recall the specific
7	Bob's approval, of course.	7	salary of 150.
8	Q. Following your	8	Q. Beyond 95,000 excuse me.
9	recommendation?	9	Above 95,000, what specific
10	MS. HARWIN: Objection to	10	salary do you recall earning from
11	the form.	11	Canal?
12	A. Yes, following a discussion	12	MS. HARWIN: Objection to
13	that Bob and I had.	13	the form.
14	Q. Okay.	14	A. I can recall in 2019 being
15	So according to this	15	given an annual salary of 300.
16	withdrawn.	16	Q. You have no recollection of
17	November 1, 2012, your	17	any other salaries?
18	salary goes up to 150, is that	18	A. I am still going. I can
19	consistent with your recollection?	19	recall at some point it being 175,
20	MS. HARWIN: Objection to	20	but I can't recall the year. And I
21	the form.	21	believe at one point I can recall
22	A. I can't recall the amount	22	200, but I can't the earlier
23	that it went up to or what it was in	23	years I can't recall specifically
24 25	2012. Q. Do you recall ever	24 25	what my salaries were what my base salaries were. I can't recall
23	Q. Do you recall ever		ouse saturies were. I can trecall





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1 G. C. ROBINSON	1 G. C. ROBINSON
2 off the top of my head.	the amount of hours that I continued
3 Q. Following the time that	3 to work that were where I had
4 Canal increased your salary after	4 felt that I wasn't being compensated
5 95,000, what was your understanding	5 for the hours that I was working,
6 as to why you were receiving more	6 and I would also add the promotion.
7 compensation?	7 Q. And when you say,
8 MS. HARWIN: Objection to	8 "promotion," what are you referring
9 the form.	9 to?
10 A. I don't recall specifically	MS. HARWIN: Objection to
when it was 95, and when when it	11 the form.
was changed to 95. So I wouldn't be	12 A. The change in title with
able to discuss why it was changed	director of production.
if I don't have the date and the	Q. So you received a raise
information of when it was.	when you were when your title
16 Q. At any time after	changed to director of production,
whatever salary you were earning at	17 correct?
18 the time that you commenced your	18 A. I can't specifically recall
employment with Canal, what was your	exactly when I was given a raise
20 understanding as to why it was ever	20 around the time that I had my title
21 increased?	21 changed.
22 MS. HARWIN: Objection to	Q. When your title changed to
23 the form.	director of production, it was, as
A. I think some of the reasons	you just characterized it, a
25 would have been my requests for it,	25 promotion. What was your
, ,	1
Page 204	Page 205
1 G. C. ROBINSON	1 G. C. ROBINSON
2 understanding as to why you were	2 Bob had directed me to do that were
3 being promoted?	3 not the things that necessarily
4 MS. HARWIN: Objection to	4 continued I think there were
5 the form.	5 there were additional jobs I just
6 A. Bob and I had discussions,	6 can't think of what they were during
7 as I said, that I would be	7 that time period at this moment.
8 transitioning from executive	8 Q. So your responsibilities,
9 assistant to focusing on production	9 with respect to managing Canal
10 and working with Berry Welsh at	personnel, increased at the time
11 Tribeca. He would he handled	that you received the director of
creative or development, and I would	12 production title?
be handling production.	MS. HARWIN: Objection to
14 Q. Did your responsibilities	14 the form.
15 within Canal also increase before	15 A. They weren't supposed to.
16 the time that Mr. De Niro approved	16 I was supposed to focus my job
your title change to director of	solely on production and replacing
18 production?	myself with somebody to be Bob's
19 MS. HARWIN: Objection to	executive assistant, and then I
20 the form.	20 would move on to solely work in
A. During the early during	21 production. But like many of the
the earlier years, there were jobs	titles that I had, and many of the
where Bob would ask me to to do	jobs that I had in the office, I
24 something such as there was just	24 would be redirected to work on
25 different jobs that I would that	something personal for Bob. I was





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1	G. C. ROBINSON	1	G. C. ROBINSON
2	G. C. ROBINSON	2	statement.
3	Q. Hold on a second. I'm	3	MS. HARWIN: There is no
4	sorry to interrupt. We are	4	question pending then
5	getting	5	MR. BENNETT: There is a
6	MR. BENNETT: Can you	6	question pending.
7	read the question back?	7	MR. DROGIN: I think the
8	(Whereupon, the requested	8	statement
9	portion was read back by the	9	MS. HARWIN: Mr. Bennett,
10	reporter:	10	do you want to clarify the
11	Q: So your	11	question that is pending?
12	responsibilities, with	12	MR. DROGIN: I just think
13	respect to managing Canal	13	the record should be clear
14	personnel, increased at the	14	that Mr. Bennett's statement
15	time that you received the	15	was it is just a yes-or-no
16	director of production	16	question and you objected to
17	title?)	17	the form of that statement.
18	Q. It is a yes or no, Ms.	18	You should let him ask the
19	Robinson.	19	question before you object to
20	MS. HARWIN: Objection to	20	it.
21	the form.	21	MR. BENNETT: Can you
22	MR. DROGIN: For the	22	read the question back again,
23	record, that wasn't a	23	please?
24	question that you objected to	24	(Whereupon, the requested
25	the form of, it was a	25	portion was read back by the
	Page 208	3	Page 209
1	C C DODDICON	I	
	G. C. ROBINSON	1	G. C. ROBINSON
	G. C. ROBINSON reporter:	1 2	G. C. ROBINSON Robinson?
2 3	reporter:		Robinson?
2	reporter: Q: So your	2	
2 3 4 5	reporter:	2 3 4 5	Robinson? A. I was still functioning as
2 3 4 5 6	reporter: Q: So your responsibilities, with respect to managing Canal personnel, increased at the	2 3 4 5 6	Robinson? A. I was still functioning as Bob's executive assistant, and when
2 3 4 5 6 7	reporter: Q: So your responsibilities, with respect to managing Canal personnel, increased at the time that you received the	2 3 4 5 6 7	Robinson?  A. I was still functioning as Bob's executive assistant, and when he directed me to do something, I did it. I wasn't Q. Were you go on.
2 3 4 5 6 7 8	reporter: Q: So your responsibilities, with respect to managing Canal personnel, increased at the time that you received the director of production	2 3 4 5 6 7 8	Robinson? A. I was still functioning as Bob's executive assistant, and when he directed me to do something, I did it. I wasn't Q. Were you go on. A. I was Bob's executive
2 3 4 5 6 7 8	reporter: Q: So your responsibilities, with respect to managing Canal personnel, increased at the time that you received the director of production title?)	2 3 4 5 6 7 8 9	Robinson? A. I was still functioning as Bob's executive assistant, and when he directed me to do something, I did it. I wasn't Q. Were you go on. A. I was Bob's executive assistant at the time.
2 3 4 5 6 7 8 9	reporter: Q: So your responsibilities, with respect to managing Canal personnel, increased at the time that you received the director of production title?) MS. HARWIN: Objection to	2 3 4 5 6 7 8 9	Robinson?  A. I was still functioning as Bob's executive assistant, and when he directed me to do something, I did it. I wasn't Q. Were you go on. A. I was Bob's executive assistant at the time. Q. Were you managing Canal
2 3 4 5 6 7 8 9 10	reporter:     Q: So your responsibilities, with respect to managing Canal personnel, increased at the time that you received the director of production title?)     MS. HARWIN: Objection to the form.	2 3 4 5 6 7 8 9 10	Robinson?  A. I was still functioning as Bob's executive assistant, and when he directed me to do something, I did it. I wasn't Q. Were you go on. A. I was Bob's executive assistant at the time. Q. Were you managing Canal personnel at all?
2 3 4 5 6 7 8 9 10 11	reporter: Q: So your responsibilities, with respect to managing Canal personnel, increased at the time that you received the director of production title?) MS. HARWIN: Objection to the form. A. I can't recall that they	2 3 4 5 6 7 8 9 10 11	Robinson?  A. I was still functioning as Bob's executive assistant, and when he directed me to do something, I did it. I wasn't Q. Were you go on. A. I was Bob's executive assistant at the time. Q. Were you managing Canal personnel at all? MS. HARWIN: Objection to
2 3 4 5 6 7 8 9 10 11 12 13	reporter: Q: So your responsibilities, with respect to managing Canal personnel, increased at the time that you received the director of production title?) MS. HARWIN: Objection to the form. A. I can't recall that they were I can't recall that they	2 3 4 5 6 7 8 9 10 11 12	Robinson?  A. I was still functioning as Bob's executive assistant, and when he directed me to do something, I did it. I wasn't Q. Were you go on. A. I was Bob's executive assistant at the time. Q. Were you managing Canal personnel at all?  MS. HARWIN: Objection to the form.
2 3 4 5 6 7 8 9 10 11 12 13	reporter: Q: So your responsibilities, with respect to managing Canal personnel, increased at the time that you received the director of production title?) MS. HARWIN: Objection to the form. A. I can't recall that they were I can't recall that they were.	2 3 4 5 6 7 8 9 10 11 12 13 14	Robinson?  A. I was still functioning as Bob's executive assistant, and when he directed me to do something, I did it. I wasn't Q. Were you go on. A. I was Bob's executive assistant at the time. Q. Were you managing Canal personnel at all?  MS. HARWIN: Objection to the form. A. I think that there were
2 3 4 5 6 7 8 9 10 11 12 13 14	reporter: Q: So your responsibilities, with respect to managing Canal personnel, increased at the time that you received the director of production title?) MS. HARWIN: Objection to the form. A. I can't recall that they were I can't recall that they were. Q. As of the date that your	2 3 4 5 6 7 8 9 10 11 12 13 14	Robinson?  A. I was still functioning as Bob's executive assistant, and when he directed me to do something, I did it. I wasn't Q. Were you go on. A. I was Bob's executive assistant at the time. Q. Were you managing Canal personnel at all?  MS. HARWIN: Objection to the form. A. I think that there were times that Bob directed me to. I
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	reporter: Q: So your responsibilities, with respect to managing Canal personnel, increased at the time that you received the director of production title?) MS. HARWIN: Objection to the form. A. I can't recall that they were I can't recall that they were. Q. As of the date that your title goes becomes director of	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Robinson?  A. I was still functioning as Bob's executive assistant, and when he directed me to do something, I did it. I wasn't Q. Were you go on. A. I was Bob's executive assistant at the time. Q. Were you managing Canal personnel at all?  MS. HARWIN: Objection to the form. A. I think that there were times that Bob directed me to. I think there were times that Bob
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	reporter: Q: So your responsibilities, with respect to managing Canal personnel, increased at the time that you received the director of production title?) MS. HARWIN: Objection to the form. A. I can't recall that they were I can't recall that they were. Q. As of the date that your title goes becomes director of production, did you manage Canal's	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Robinson?  A. I was still functioning as Bob's executive assistant, and when he directed me to do something, I did it. I wasn't Q. Were you go on. A. I was Bob's executive assistant at the time. Q. Were you managing Canal personnel at all?  MS. HARWIN: Objection to the form. A. I think that there were times that Bob directed me to. I think there were times that Bob directed me to, but it wasn't
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	reporter: Q: So your responsibilities, with respect to managing Canal personnel, increased at the time that you received the director of production title?) MS. HARWIN: Objection to the form. A. I can't recall that they were I can't recall that they were. Q. As of the date that your title goes becomes director of production, did you manage Canal's personnel?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Robinson?  A. I was still functioning as Bob's executive assistant, and when he directed me to do something, I did it. I wasn't Q. Were you go on. A. I was Bob's executive assistant at the time. Q. Were you managing Canal personnel at all?  MS. HARWIN: Objection to the form. A. I think that there were times that Bob directed me to. I think there were times that Bob directed me to, but it wasn't something that was a regular part of
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	reporter: Q: So your responsibilities, with respect to managing Canal personnel, increased at the time that you received the director of production title?) MS. HARWIN: Objection to the form. A. I can't recall that they were I can't recall that they were. Q. As of the date that your title goes becomes director of production, did you manage Canal's personnel? MS. HARWIN: Objection to	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Robinson?  A. I was still functioning as Bob's executive assistant, and when he directed me to do something, I did it. I wasn't Q. Were you go on. A. I was Bob's executive assistant at the time. Q. Were you managing Canal personnel at all?  MS. HARWIN: Objection to the form. A. I think that there were times that Bob directed me to. I think there were times that Bob directed me to, but it wasn't something that was a regular part of my job. I facilitated a lot of
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	reporter: Q: So your responsibilities, with respect to managing Canal personnel, increased at the time that you received the director of production title?) MS. HARWIN: Objection to the form. A. I can't recall that they were I can't recall that they were. Q. As of the date that your title goes becomes director of production, did you manage Canal's personnel? MS. HARWIN: Objection to the form.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Robinson?  A. I was still functioning as Bob's executive assistant, and when he directed me to do something, I did it. I wasn't Q. Were you go on. A. I was Bob's executive assistant at the time. Q. Were you managing Canal personnel at all?  MS. HARWIN: Objection to the form. A. I think that there were times that Bob directed me to. I think there were times that Bob directed me to, but it wasn't something that was a regular part of my job. I facilitated a lot of messages from him to others, but it
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	reporter: Q: So your responsibilities, with respect to managing Canal personnel, increased at the time that you received the director of production title?) MS. HARWIN: Objection to the form. A. I can't recall that they were I can't recall that they were. Q. As of the date that your title goes becomes director of production, did you manage Canal's personnel? MS. HARWIN: Objection to the form. A. When I had received the	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Robinson?  A. I was still functioning as Bob's executive assistant, and when he directed me to do something, I did it. I wasn't Q. Were you go on. A. I was Bob's executive assistant at the time. Q. Were you managing Canal personnel at all?  MS. HARWIN: Objection to the form. A. I think that there were times that Bob directed me to. I think there were times that Bob directed me to, but it wasn't something that was a regular part of my job. I facilitated a lot of messages from him to others, but it wasn't, again, a regular part of my
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	reporter: Q: So your responsibilities, with respect to managing Canal personnel, increased at the time that you received the director of production title?) MS. HARWIN: Objection to the form. A. I can't recall that they were I can't recall that they were. Q. As of the date that your title goes becomes director of production, did you manage Canal's personnel? MS. HARWIN: Objection to the form. A. When I had received the title of director of production I	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Robinson?  A. I was still functioning as Bob's executive assistant, and when he directed me to do something, I did it. I wasn't Q. Were you go on. A. I was Bob's executive assistant at the time. Q. Were you managing Canal personnel at all?  MS. HARWIN: Objection to the form. A. I think that there were times that Bob directed me to. I think there were times that Bob directed me to, but it wasn't something that was a regular part of my job. I facilitated a lot of messages from him to others, but it wasn't, again, a regular part of my job.
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1	G. C. ROBINSON	1	G. C. ROBINSON
1 2		1 2	
3	MS. HARWIN: Okay.	3	employee to do.
	(Whereupon, a recess was		Q. Okay.
4	taken at this time.)	4	And going back to my
5	Q. Ms. Robinson, you talked to	5	question earlier, what does Dan
6	me a little bit about what you were	6	Harvey do. I will reiterate that
7	doing for Canal during various	7	question again.
8	years. As of 2015, what was Dan	8	What was Dan Harvey doing
9	Harvey doing for Canal?	9	for Canal, specifically, as of 2015?
10	MS. HARWIN: Objection to	10	MS. HARWIN: Objection to
11	the form.	11	the form.
12	A. Dan Harvey, like I, was	12	A. Dan Harvey
13	functioning as an executive	13	(Whereupon, a discussion
14	assistant.	14	was held off the record.)
15	Q. In what way withdraw the	15	A. Dan Harvey, like me,
16	question.	16	handled what Bob directed us to do,
17	What is your understanding	17	whether it was picking him up
18	as to the term executive assistant,	18	coffee, or newspapers, or at times
19	what type of job duties fall within	19	organizing a meeting for Bob,
20	that description?	20	accompanying Bob on set when I was
21	MS. HARWIN: Objection to	21	requested. He helped put together
22	the form.	22	the gym at He, like I, did
23	A. I would say core material	23	supported his wellbeing, his
24	duties of an executive assistant is	24	physical wellbeing, and his and
25	doing what Bob asks and directing an	25	his health. Dan worked a couple
23	doing what boo asks and directing an	20	ins heatin. Dan worked a couple
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1	G. C. ROBINSON	1	G. C. ROBINSON
2	at times an hour or two a couple of	2	to do what Bob directed of you
3	times a week training Bob, but at	3	regardless what title or what jobs
4	times he did not train Bob for weeks	4	you might do a little bit more of.
5	at a time and at times a month.	5	It really was what Bob asked you to
6	When Bob was in California at	6	do. And a lot of times it went
7	Dan facilitated items that Bob	7	outside any title that any Canal
8	needed during that time. Dan, in	8	employee would have. Everybody
9	addition, at times, worked with	9	Q. Do you know specifically
10	production on Bob's needs when it	10	what Mr. De Niro directed Mr. Dan
11	came to gym or anything related to	11	Harvey to do on a day-to-day basis?
12	his his needs. There were	12	
13		13	MS. HARWIN: Objection to the form.
14	Q. From your perspective	14	
15	A. Can I finish?	15	A. I don't know the full
	Q. No. Because it is really		extent of what Dan Harvey's role is.
16	running far afield.	16	I can only, as discussed before,
17	Is your perspective that	17	give examples of things that I had
18	every person that Canal compensated	18	seen.
19	had no independent role, they simply	19	Q. And have you ever seen Dan
20	did what Mr. De Niro directed them	20	Harvey hand out work assignments to
21	to do or was it something different?	21	Sabrina, Jillian, or Katherine, or
22	MS. HARWIN: Objection to	22	Lu Lu, or anyone else that were
23	the form.	23	employed as administrative
24	A. I think that is the core	24	assistants?
25	material responsibility at Canal is	25	MS. HARWIN: Objection to





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1	G. C. ROBINSON	1	G. C. ROBINSON
2	the form.	2	MS. HARWIN: Objection to
3	A. I had seen Dan Harvey	3	the form.
4	direct Michael Kaplan when it came	4	A. I spoke to Peter Grant
5	to gym equipment and things that had	5	about Bob's needs in production.
6	to do with 110. I had been directed	6	Q. Your work went a little bit
7	by Dan Harvey, as did Amelia and	7	more beyond speaking with him,
8	Olivia, to book flights for Dan	8	correct?
9	Harvey. There those are some of	9	MS. HARWIN: Objection to
10	the things that I can recall at this	10	the form.
11	moment.	11	A. Can you clarify? Can you
12	Q. Did Dan Harvey ever work on	12	rephrase that?
13	the transactional documents related	13	Q. It is your words, Ms.
14	to any particular film production	14	Robinson. Over the course of years
15	that Mr. De Niro was involved in?	15	you have probably hundreds of
16	MS. HARWIN: Objection to	16	e-mails back and forth with Peter
17	the form.	17	Grant reflecting various aspects of
18	A. Can you clarify	18	work relating to a varying number of
19	transactional documents?	19	films or movies or production that
20	Q. Well, in in connection	20	Mr. De Niro was involved in.
21	with your various roles within	21	A. Yes.
22	Canal, over the course of the years,	22	Q. Do you recall specifically
23	you interacted with Peter Grant on	23	working with Peter Grant about, for
24	transactions involving Mr. De Niro's	24	example, perk budgets?
25	acting services, correct?	25	MS. HARWIN: Objection to
			·
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1	G. C. ROBINSON	1	G. C. ROBINSON
2	the form.	2	Bob's needs were on
3	A. Yes, there were a few times	3	Q. Right.
4	where I did, which goes to, as I	4	A on a couple of films.
5	said, working with Bob what Bob's	5	Q. Did Dan Harvey ever
6	needs are on productions. What he	6	exchange e-mails with Attorney Grant
7	needed.	7	relative to any issue with a perk
8	Q. Right. So on those	8	budget on any film?
9	occasions that you were working with	9	MS. HARWIN: Objection to
10	Peter Grant on the perk budgets for	10	the form.
11	a particular production, what were	11	A. Not that I can recall.
12	you doing specifically?	12	Q. Did Dan Harvey ever notify
13	MS. HARWIN: Objection to	13	employees about raises or bonuses?
14	the form.	14	MS. HARWIN: Objection to
15	A. On the couple of films that	15	the form.
16	had perk budgets, I was researching	16	A. Not that I can recall.
17	costs of hotel rooms for Bob, and	17	Q. Did Dan Harvey ever inform
18	Bob's family, researching costs and	18	Burton, Michael Tasch, Mark
19	providing them for what Bob's needs	19	Bosswick, or anyone else about
20	were on on set.	20	raises or bonuses of Canal
21	Q. Relative to the overall	21	personnel?
22	budget of the perks, correct?	22	MS. HARWIN: Objection to
23	MS. HARWIN: Objection to	23	the form.
24	the form.	24	A. Other than himself, I can't
25	A. The perk budget was what	25	recall.





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1	G. C. ROBINSON	1	G. C. ROBINSON
2	Q. Did Dan Harvey ever make	2	make recommendations to Mr.
3	recommendations to Mr. De Niro about	3	De Niro about an increase or
4	an increase or a decrease of	4	a decrease of compensation
5	compensation for Canal personnel at	5	for Canal personnel at any
6	any time?	6	time?)
7	MS. HARWIN: Objection to	7	A. I don't know and I can't
8	the form.	8	recall a time when I was present
9	A. I can't recall or I don't	9	that he did.
10	know the full extent of Dan Harvey's	10	Q. Did Dan Harvey, as far as
11	position, or what he may or I am	11	you are aware of, have an e-mail
12	not going to speculate to what he	12	address for Canal withdrawn.
13	may or may not have spoken to Bob	13	At the time that you were
14	about.	14	employed by Canal Productions, one
15	Q. So you don't know?	15	of the e-mail addresses that you had
16		16	
17	MS. HARWIN: Objection to the form.	17	ended in @CanalProductions.com, correct?
18	A. I don't know to which	18	A. Yes, that was one of them.
19		19	
20	question? MR. BENNETT: Can you	20	Q. Okay.
21		21	Did Dan Harvey ever have an e-mail address that ended in
22	read the question back? (Whereupon, the requested	22	@CanalProductions.com?
23	portion was read back by the	23	MS. HARWIN: Objection to
24	*	24	the form.
25	reporter: Q: Did Dan Harvey ever	25	A. During the time that I was
23	Q. Did Dali Harvey ever	23	A. During the time that I was
	Page 220		Page 221
1	Page 220 G. C. ROBINSON	1	Page 221 G. C. ROBINSON
2	<del>-</del>	2	-
	G. C. ROBINSON		G. C. ROBINSON
2	G. C. ROBINSON at Canal, I can't recall him having	2 3 4	G. C. ROBINSON A. Yes.
2 3	G. C. ROBINSON at Canal, I can't recall him having one.	2 3	G. C. ROBINSON A. Yes. Q. As far as you are aware,
2 3 4	G. C. ROBINSON at Canal, I can't recall him having one. Q. To clarify thank you. There is no question today that I am	2 3 4	G. C. ROBINSON A. Yes. Q. As far as you are aware, where would Mr. Harvey regularly
2 3 4 5	G. C. ROBINSON at Canal, I can't recall him having one. Q. To clarify thank you.	2 3 4 5	G. C. ROBINSON A. Yes. Q. As far as you are aware, where would Mr. Harvey regularly stay when he was in New York?
2 3 4 5 6	G. C. ROBINSON at Canal, I can't recall him having one. Q. To clarify thank you. There is no question today that I am going to ask you that occurs outside	2 3 4 5 6	G. C. ROBINSON A. Yes. Q. As far as you are aware, where would Mr. Harvey regularly stay when he was in New York? MS. HARWIN: Objection to
2 3 4 5 6 7	G. C. ROBINSON at Canal, I can't recall him having one. Q. To clarify thank you. There is no question today that I am going to ask you that occurs outside of the time period that you were	2 3 4 5 6 7	G. C. ROBINSON A. Yes. Q. As far as you are aware, where would Mr. Harvey regularly stay when he was in New York? MS. HARWIN: Objection to the form. A. He would either stay at either stay at the Greenwich Hotel
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	G. C. ROBINSON at Canal, I can't recall him having one. Q. To clarify thank you. There is no question today that I am going to ask you that occurs outside of the time period that you were employed. As far as you can recall, between 2008, when you commenced employment with Canal, and the date of your resignation, on April 6, 2019, how many times did Dan Harvey step inside Canal's office? MS. HARWIN: Can I clarify, the office at 375 Greenwich Street? MR. BENNETT: Yes. That is correct. A. I can't recall. Q. Do you recall ever seeing him in that office? A. Yes.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	G. C. ROBINSON A. Yes. Q. As far as you are aware, where would Mr. Harvey regularly stay when he was in New York? MS. HARWIN: Objection to the form. A. He would either stay at either stay at the Greenwich Hotel or with his mother in Long Island, from what I can recall. Q. Okay. Do you know how many films Mr. Harvey has worked with Mr. De Niro on? MS. HARWIN: Objection to the form. A. I don't. Q. Do you know anything about his educational or work experience prior to beginning employment with Canal? MS. HARWIN: Objection to





Page 222  1 G. C. ROBINSON 2 conversation where I would have 3 that I would have known anything 4 about what he did prior to Canal. 5 Q. As far as you recall, 6 within the amounts included with any 7 particular perk budget that Mr. De 8 Niro obtained at any point over the 9 course of your employment with 10 Canal, was there a portion of that 11 perk budget that was paid by 12 canal? 13 Canal? 14 MS. HARWIN: Objection to 15 the form. 16 A. Not specific to my salary, 17 no. 18 Q. Can you refer to the 19 exhibit? I am just going to ask you 20 It is the one P13908. 22 Q. It is the one P13908. 22 Q. Nine. 2 Ms HARWIN Dave made in this action is not page and I
2 conversation where I would have 3 that I would have known anything 4 about what he did prior to Canal. 5 Q. As far as you recall, 6 within the amounts included with any 7 particular perk budget that Mr. De 8 Niro obtained at any point over the 9 course of your employment with 10 Canal, was there a portion of that 11 perk budget that was intended to 12 offset your salary that was paid by 13 Canal? 14 MS. HARWIN: Objection to 15 the form. 16 A. Not specific to my salary, 17 no. 18 Q. Can you refer to the 19 exhibit? I am just going to ask you 20 to please turn to page nine of 20. 21 A. What page? 22 my understanding is one of the 3 claims that you have made in this 4 action is that you feel as though 4 action is that you have made in this 4 action is that you have made in this 4 action is that you feel as though 9 you were not paid in an equivalent manner to Dan Harvey, is that correct?  8 MS. HARWIN: Objection to 10 A. I had made a complaint 11 about, and objected to, being paid 12 less than Dan Harvey. 13 Q. Right. But the claim in 14 this action is basically saying the 15 same thing, correct? 16 MS. HARWIN: Objection to 17 the form. 18 Q. Can you refer to the 18 A. I have a claim, yes. 19 exhibit? I am just going to ask you 19 Q. What duties of yours and 20 to please turn to page nine of 20. 21 A. Which exhibit? 22 Q. It is the one P13908. 23 Q. If any?
that I would have known anything about what he did prior to Canal.  Q. As far as you recall, within the amounts included with any particular perk budget that Mr. De Niro obtained at any point over the course of your employment with perk budget that was intended to course of your salary that was paid by Canal, MS. HARWIN: Objection to MS. HARWIN: Objection to canal?  MS. HARWIN: Objection to the form.  A. Not specific to my salary, the form.  MS. HARWIN: Objection to the form.  MS. HARWIN: Objection to the form.  A. I had made a complaint about, and objected to, being paid less than Dan Harvey.  Q. Right. But the claim in this action is basically saying the same thing, correct?  MS. HARWIN: Objection to the form.  MS. HARWIN: Objection to the form.  A. I have a claim, yes. Q. What duties of yours and to please turn to page nine of 20.  A. Which exhibit?  A. Which exhibit?  Q. It is the one P13908.  Q. If is the one P13908.
4 about what he did prior to Canal. 5 Q. As far as you recall, 6 within the amounts included with any 7 particular perk budget that Mr. De 8 Niro obtained at any point over the 9 course of your employment with 10 Canal, was there a portion of that 11 perk budget that was intended to 12 offset your salary that was paid by 13 Canal? 14 MS. HARWIN: Objection to 15 the form. 16 A. Not specific to my salary, 17 no. 18 Q. Can you refer to the 19 exhibit? I am just going to ask you 20 Li tis the one Pl3908. 21 A. What page? 22 A. What page? 24 A. What page? 26 MS. HARWIN: Objection to 27 correct? 28 MS. HARWIN: Objection to 29 course of your selast shough 20 vou were not paid in an equivalent manner to Dan Harvey, is that 20 correct? 21 MS. HARWIN: Objection to 4 manner to Dan Harvey, is that 22 action is that you feel as though 25 you were not paid in an equivalent manner to Dan Harvey, is that 26 wou were not paid in an equivalent manner to Dan Harvey, is that 27 manner to Dan Harvey, is that 28 manner to Dan Harvey, is that 29 action is that you feel as though 20 were not paid in an equivalent manner to Dan Harvey, is that 20 action is that you feel as though 20 to please turn to page nine of 20. 21 A. Which exhibit? 22 Q. It is the one Pl3908. 23 A. What page? 24 A. What page? 25 Q. If any?
5 Q. As far as you recall, 6 within the amounts included with any 7 particular perk budget that Mr. De 8 Niro obtained at any point over the 9 course of your employment with 10 Canal, was there a portion of that 11 perk budget that was paid by 12 offset your salary that was paid by 13 Canal? 14 MS. HARWIN: Objection to 15 the form. 16 A. Not specific to my salary, 17 no. 18 Q. Can you refer to the 19 exhibit? I am just going to ask you 20 to please turn to page nine of 20. 21 A. What page? 23 A. What page?  5 you were not paid in an equivalent manner to Dan Harvey, is that correct? 7 correct? 8 MS. HARWIN: Objection to 10 A. I had made a complaint 11 about, and objected to, being paid less than Dan Harvey. 12 less than Dan Harvey. 13 Q. Right. But the claim in 14 this action is basically saying the same thing, correct? 15 same thing, correct? 16 A. Not specific to my salary, 16 MS. HARWIN: Objection to 17 the form. 18 A. I have a claim, yes. 19 Q. What duties of yours and 20 to please turn to page nine of 20. 21 A. Which exhibit? 22 Q. It is the one P13908. 23 Q. If any?
within the amounts included with any particular perk budget that Mr. De Niro obtained at any point over the course of your employment with canal, was there a portion of that confiset your salary that was paid by canal?  MS. HARWIN: Objection to course of your employment with canal, was there a portion of that confiset your salary that was paid by canal?  MS. HARWIN: Objection to canal?  MS. HARWIN: Objection to confiset your salary that was paid by confiset your salary that was paid
7 particular perk budget that Mr. De 8 Niro obtained at any point over the 9 course of your employment with 10 Canal, was there a portion of that 11 perk budget that was intended to 12 offset your salary that was paid by 13 Canal? 14 MS. HARWIN: Objection to 15 the form. 16 A. Not specific to my salary, 17 no. 18 Q. Can you refer to the 19 exhibit? I am just going to ask you 20 Li is the one P13908. 21 A. What page? 22 Q. If is my.
Niro obtained at any point over the course of your employment with 2 the form.  Canal, was there a portion of that 1 about, and objected to, being paid 1 offset your salary that was paid by 1 less than Dan Harvey.  Canal? 1 Q. Right. But the claim in 1 this action is basically saying the 1 same thing, correct?  A. Not specific to my salary, 1 mo.
9 course of your employment with 10 Canal, was there a portion of that 11 perk budget that was intended to 12 offset your salary that was paid by 13 Canal? 14 MS. HARWIN: Objection to 15 the form. 16 A. Not specific to my salary, 17 no. 18 Q. Can you refer to the 19 exhibit? I am just going to ask you 20 It is the one P13908. 21 A. What page? 22 Q. It is the one P13908. 20 the form. 20 the form. 21 the form. 22 Q. Right. But the claim in 22 this action is basically saying the 23 the form. 26 MS. HARWIN: Objection to 27 the form. 28 A. I have a claim, yes. 29 Q. What duties of yours and 20 to please turn to page nine of 20. 20 Dan Harvey overlapped? 21 MS. HARWIN: Objection to 22 the form. 23 Q. If any?
Canal, was there a portion of that  1 perk budget that was intended to 1 about, and objected to, being paid 1 less than Dan Harvey. 1 Q. Right. But the claim in 1 this action is basically saying the 1 same thing, correct? 1 A. Not specific to my salary, 1 no. 1 MS. HARWIN: Objection to 1 the form. 1 MS. HARWIN: Objection to 2 OLIT is the one P13908. 2 MS. HARWIN: Objection to 2 OLIT is the one P13908. 2 MS. HARWIN: Objection to 2 OLIT is the one P13908. 2 MS. HARWIN: Objection to 2 OLIT is the one P13908. 2 MS. HARWIN: Objection to 2 OLIT is the one P13908. 2 MS. HARWIN: Objection to 2 OLIT is the one P13908. 3 MS. HARWIN: Objection to 4 MS. HARWIN: Objection to 5 MS. HARWIN: Objection to 6 MS. HARWIN: Objection to 7 MS. HARWIN: Objection to 8 MS. HARWIN: Objection to 9 MS. HARWIN: Objection to
11 perk budget that was intended to 12 offset your salary that was paid by 13 Canal? 14 MS. HARWIN: Objection to 15 the form. 16 A. Not specific to my salary, 17 no. 18 Q. Can you refer to the 19 exhibit? I am just going to ask you 20 to please turn to page nine of 20. 21 A. Which exhibit? 22 Q. Right. But the claim in 14 this action is basically saying the 15 same thing, correct? 16 MS. HARWIN: Objection to 17 the form. 18 A. I have a claim, yes. 19 Q. What duties of yours and 20 to please turn to page nine of 20. 21 MS. HARWIN: Objection to 22 Q. It is the one P13908. 23 A. What page? 24 Q. If any?
12 offset your salary that was paid by 13 Canal? 14 MS. HARWIN: Objection to 15 the form. 16 A. Not specific to my salary, 17 no. 18 Q. Can you refer to the 19 exhibit? I am just going to ask you 20 to please turn to page nine of 20. 21 A. Which exhibit? 22 Q. It is the one P13908. 23 A. What page? 21 Is see than Dan Harvey. 20 Right. But the claim in 14 this action is basically saying the 15 same thing, correct? 16 MS. HARWIN: Objection to 17 the form. 18 A. I have a claim, yes. 19 Q. What duties of yours and 20 Dan Harvey overlapped? 21 MS. HARWIN: Objection to 22 Q. It is the one P13908. 23 Q. If any?
Canal?  MS. HARWIN: Objection to  the form.  A. Not specific to my salary,  no.  Q. Right. But the claim in  this action is basically saying the  same thing, correct?  MS. HARWIN: Objection to  the form.  Respectively.  MS. HARWIN: Objection to  the form.  A. I have a claim, yes.  Q. What duties of yours and  part of please turn to page nine of 20.  A. Which exhibit?  Q. What duties of yours and  Dan Harvey overlapped?  MS. HARWIN: Objection to  Dan Harvey overlapped?  MS. HARWIN: Objection to  Can you refer to the  Respectively.  A. Which exhibit?  A. Which exhibit?  A. Which exhibit?  A. What page?  A. What page?  Can you refer to the  Dan Harvey overlapped?  MS. HARWIN: Objection to  the form.  Can you refer to the  Can you refer to the  Dan Harvey overlapped?  MS. HARWIN: Objection to  Can you refer to the  Can you refer
14 MS. HARWIN: Objection to 15 the form. 16 A. Not specific to my salary, 17 no. 18 Q. Can you refer to the 19 exhibit? I am just going to ask you 20 to please turn to page nine of 20. 21 A. Which exhibit? 22 Q. It is the one P13908. 23 A. What page? 24 this action is basically saying the same thing, correct? 15 MS. HARWIN: Objection to 16 MS. HARWIN: Objection to 17 the form. 18 A. I have a claim, yes. 19 Q. What duties of yours and 20 Dan Harvey overlapped? 21 MS. HARWIN: Objection to 22 Q. It is the one P13908. 23 Q. If any?
the form.  15 same thing, correct?  A. Not specific to my salary,  16 MS. HARWIN: Objection to  17 no.  18 Q. Can you refer to the  19 exhibit? I am just going to ask you  20 to please turn to page nine of 20.  21 A. Which exhibit?  22 Q. It is the one P13908.  23 A. What page?  15 same thing, correct?  MS. HARWIN: Objection to  16 MS. HARWIN: Objection to  17 the form.  20 What duties of yours and  20 Dan Harvey overlapped?  MS. HARWIN: Objection to  21 the form.  22 Q. If any?
16 A. Not specific to my salary, 17 no. 18 Q. Can you refer to the 19 exhibit? I am just going to ask you 20 to please turn to page nine of 20. 21 A. Which exhibit? 22 Q. It is the one P13908. 23 A. What page?  16 MS. HARWIN: Objection to 17 the form. 28 A. I have a claim, yes. 29 Q. What duties of yours and 20 Dan Harvey overlapped? 21 MS. HARWIN: Objection to 22 the form. 23 Q. If any?
17 no. 18 Q. Can you refer to the 19 exhibit? I am just going to ask you 20 to please turn to page nine of 20. 21 A. Which exhibit? 22 Q. It is the one P13908. 23 A. What page? 21 the form. 22 Dan Harvey overlapped? 23 MS. HARWIN: Objection to 24 the form. 25 Q. If any?
18Q. Can you refer to the18A. I have a claim, yes.19exhibit? I am just going to ask you19Q. What duties of yours and20to please turn to page nine of 20.20Dan Harvey overlapped?21A. Which exhibit?21MS. HARWIN: Objection to22Q. It is the one P13908.22the form.23A. What page?23Q. If any?
19exhibit? I am just going to ask you19Q. What duties of yours and20to please turn to page nine of 20.20Dan Harvey overlapped?21A. Which exhibit?21MS. HARWIN: Objection to22Q. It is the one P13908.22the form.23A. What page?23Q. If any?
20to please turn to page nine of 20.20Dan Harvey overlapped?21A. Which exhibit?21MS. HARWIN: Objection to22Q. It is the one P13908.22the form.23A. What page?23Q. If any?
21 A. Which exhibit? 21 MS. HARWIN: Objection to 22 Q. It is the one P13908. 22 the form. 23 A. What page? 23 Q. If any?
22 Q. It is the one P13908. 22 the form. 23 A. What page? 23 Q. If any?
23 Å. What page? 23 Q. If any?
1 2 Table 1 A. As I said, build ball allu I
Before we talk about this, 25 functioned as executive assistant to
Defore we talk about this,
Page 224 Page 225
1 G. C. ROBINSON 1 G. C. ROBINSON
2 Bob. When directed to, we ran 2 correct?
3 errands, picked up coffee, did what 3 MS. HARWIN: Objection to
4 Bob directed us to do. We both 4 the form.
5 supported his physical wellbeing and 5 A. I wasn't sure of the full
6 his health. We both had a part in 6 extent of what Bob had asked Dan
7 helping with the project. Dan 7 Harvey to do. As I am not aware of
8 Harvey helped put the gym together 8 the full extent of what Dan Harvey's
9 and what equipment would be needed 9 general responsibilities were.
there. We both we both did what 10 Q. Right, so in that respect,
Bob directed us to do. When Bob 11 how is it that you have knowledge of
Bob directed us to do. When Bob 12 how is it that you have knowledge of overlapping duties?
11 Bob directed us to do. When Bob 12 asked either Dan Harvey or I to 13 accompany on set, we did. Dan 11 how is it that you have knowledge of overlapping duties? 12 MS. HARWIN: Objection to
11 Bob directed us to do. When Bob 12 asked either Dan Harvey or I to 13 accompany on set, we did. Dan 14 Harvey helped arrange meetings for 15 how is it that you have knowledge of overlapping duties? 16 MS. HARWIN: Objection to the form.
11 Bob directed us to do. When Bob 12 asked either Dan Harvey or I to 13 accompany on set, we did. Dan 14 Harvey helped arrange meetings for 15 Bob at times when they were on set  11 how is it that you have knowledge of overlapping duties? 12 averlapping duties? 13 MS. HARWIN: Objection to the form. 14 the form. 15 A. As I said, I can only
11 Bob directed us to do. When Bob 12 asked either Dan Harvey or I to 13 accompany on set, we did. Dan 14 Harvey helped arrange meetings for 15 Bob at times when they were on set 16 and away. He facilitated paperwork  11 how is it that you have knowledge of overlapping duties? 12 overlapping duties? 13 MS. HARWIN: Objection to 14 the form. 15 A. As I said, I can only attest to ones that I had seen, been
11 Bob directed us to do. When Bob 12 asked either Dan Harvey or I to 13 accompany on set, we did. Dan 14 Harvey helped arrange meetings for 15 Bob at times when they were on set 16 and away. He facilitated paperwork 17 when it came to when Bob was on set.  11 how is it that you have knowledge of overlapping duties? 12 averlapping duties? 13 MS. HARWIN: Objection to 14 the form. 15 A. As I said, I can only 16 attest to ones that I had seen, been involved in, or knew about.
11 Bob directed us to do. When Bob 12 asked either Dan Harvey or I to 13 accompany on set, we did. Dan 14 Harvey helped arrange meetings for 15 Bob at times when they were on set 16 and away. He facilitated paperwork 17 when it came to when Bob asked 18 how is it that you have knowledge of overlapping duties? 12 averlapping duties? 13 MS. HARWIN: Objection to 14 the form. 15 A. As I said, I can only 16 attest to ones that I had seen, been 17 involved in, or knew about. 18 Q. Are there any duties that
Bob directed us to do. When Bob asked either Dan Harvey or I to asked either Dan Harvey or I to accompany on set, we did. Dan Harvey helped arrange meetings for Bob at times when they were on set and away. He facilitated paperwork when it came to when Bob was on set. He traveled with Bob when Bob asked him to, which is what I did as well.  how is it that you have knowledge of overlapping duties?  MS. HARWIN: Objection to the form. A. As I said, I can only attest to ones that I had seen, been involved in, or knew about. Q. Are there any duties that you performed that Mr. Harvey did
11 Bob directed us to do. When Bob 12 asked either Dan Harvey or I to 13 accompany on set, we did. Dan 14 Harvey helped arrange meetings for 15 Bob at times when they were on set 16 and away. He facilitated paperwork 17 when it came to when Bob was on set. 18 He traveled with Bob when Bob asked 19 him to, which is what I did as well. 20 There are many many examples, but  10 asked either Dan Harvey or I to 12 overlapping duties? 14 the form. 15 A. As I said, I can only 16 attest to ones that I had seen, been 17 involved in, or knew about. 18 Q. Are there any duties that 19 you performed that Mr. Harvey did 19 not perform?
11 Bob directed us to do. When Bob 12 asked either Dan Harvey or I to 13 accompany on set, we did. Dan 14 Harvey helped arrange meetings for 15 Bob at times when they were on set 16 and away. He facilitated paperwork 17 when it came to when Bob was on set. 18 He traveled with Bob when Bob asked 19 him to, which is what I did as well. 20 There are many many examples, but 21 how is it that you have knowledge of overlapping duties? 12 overlapping duties? 13 A. As I said, I can only 14 the form. 15 A. As I said, I can only 16 attest to ones that I had seen, been 17 involved in, or knew about. Q. Are there any duties that 19 you performed that Mr. Harvey did 19 not perform? 20 MS. HARWIN: Objection to
Bob directed us to do. When Bob asked either Dan Harvey or I to asked either Dan Harvey or I to accompany on set, we did. Dan Harvey helped arrange meetings for Bob at times when they were on set and away. He facilitated paperwork when it came to when Bob was on set. He traveled with Bob when Bob asked him to, which is what I did as well. There are many many examples, but the with that you have knowledge of overlapping duties?  MS. HARWIN: Objection to the form.  A. As I said, I can only attest to ones that I had seen, been involved in, or knew about. Q. Are there any duties that you performed that Mr. Harvey did not perform? There are many many examples, but that is what comes to mind at this moment.  MS. HARWIN: Objection to the form.
Bob directed us to do. When Bob asked either Dan Harvey or I to accompany on set, we did. Dan Harvey helped arrange meetings for Bob at times when they were on set and away. He facilitated paperwork when it came to when Bob was on set. He traveled with Bob when Bob asked him to, which is what I did as well. There are many many examples, but thow is it that you have knowledge of overlapping duties?  MS. HARWIN: Objection to the form.  A. As I said, I can only attest to ones that I had seen, been involved in, or knew about. Q. Are there any duties that you performed that Mr. Harvey did not perform?  That is what comes to mind at this moment.  Q. You testified not long ago  A. I think there were duties
11 Bob directed us to do. When Bob 12 asked either Dan Harvey or I to 13 accompany on set, we did. Dan 14 Harvey helped arrange meetings for 15 Bob at times when they were on set 16 and away. He facilitated paperwork 17 when it came to when Bob was on set. 18 He traveled with Bob when Bob asked 19 him to, which is what I did as well. 20 There are many many examples, but 21 that is what comes to mind at this 22 moment.  11 how is it that you have knowledge of overlapping duties?  12 overlapping duties?  13 MS. HARWIN: Objection to 14 the form.  15 A. As I said, I can only attest to ones that I had seen, been involved in, or knew about.  17 involved in, or knew about.  Q. Are there any duties that you performed that Mr. Harvey did not perform?  MS. HARWIN: Objection to the form.





	Page 226		Page 227
1	G. C. ROBINSON	1	G. C. ROBINSON
2	up tables for the birthday party for	2	up tables for the birthday
3	Bob, picking out gifts, going	3	party for Bob, picking out
4	shopping with him.	4	gifts, going shopping with
5	Q. How do you know Mr. Harvey	5	him.)
6	didn't do those things?	6	A. I have lost my train of
7	MS. HARWIN: Objection to	7	thought. Let's move to the
8	the form.	8	whatever question you have next.
9	I will note that it	9	Q. So do you not have an
10	appears that the witness did	10	answer to that?
11	not complete	11	A. Can you repeat your
12	MR. DROGIN: It appears	12	question?
13	that the witness wasn't	13	MR. BENNETT: Can you
14	answering the question	14	read it back?
15	actually.	15	(Whereupon, the requested
16	A. I'm sorry to ask, can the	16	portion was read back by the
17	court reporter just read the last	17	reporter:
18	portion of my answer?	18	Q: Are there any duties
19	(Whereupon, the requested	19	that you performed that Mr.
20	portion was read back by the	20	Harvey did not perform?)
21	reporter:	21	MS. HARWIN: Objection to
22	A: I think there were	22	the form.
23	duties that were	23	A. I don't know because I
24	stereotypically female that I	24	don't know the full extent of Dan
25	was asked to do, such as set	25	Harvey's responsibility, or what Bob
20	was asked to do, such as set		That vey's responsibility, or what Boo
	Page 228		Page 229
1	G. C. ROBINSON	1	G. C. ROBINSON
2	directed him to do, or asked him to	2	MS. HARWIN: Objection to
3	do.	3	the form.
4	Q. During the work that you	4	A. I wouldn't I don't ever
5	performed on perk budgets, do you	5	recall describing what Dan Harvey
6	ever recall seeing Mr. Harvey's name	6	was on a perk fund budget.
7	referenced?	7	Q. Okay.
8	MS. HARWIN: Objection to	8	Do you know if Mr. Harvey
9	the form.	9	was ever credited in any films, and
10	A. Yes. He was on I can	10	if so, what title was within the
11	recall him being on a perk budget	11	credit?
12	for expenses.	12	MS. HARWIN: Objection to
13	Q. He was listed as a personal	13	the form.
14	trainer, correct?	14	A. I can't recall seeing him
15	MS. HARWIN: Objection to	15	on the credits on any of Bob's
16	the form.	16	films.
17	A. He was listed as what	17	Q. And at one point you were
18	one of Bob's needs on sets. I don't	18	advised by, I think, it was Berry
19	recall if it was specified if he	19	Welsh, that you were not able to be
20	was specified with the title of	20	credited on a particular film. Is
21	trainer. I recall putting in Dan	21	that right?
	Harvey.	22	MS. HARWIN: Objection to
22		l ^ ^	.1 . C
23	Q. Do you think you described	23	the form.
		23 24 25	the form.  A. No, that is not correct.  Q. Did anyone from Tribeca





G. C. ROBINSON  inform you that they were not able created as quote unquote "director" in whole or in part on any film?  M. HARWIN: Objection to the form.  A Berry Welsh had e-mailed me about being unable to have me about hand the professed of the child like you to please for having a final the bottom, which is Petrouray 26, at the bottom, which is Petrouray 26, at the bottom, which is Petrouray 26, and that the bottom, which is Petrouray 26, and that the bottom, which is Petrouray 26, and that the bottom, have the desired and that pousured the about in the bottom, and that a bottom, and that a bott		5 020		D 001
2 inform you that they were not able to reference you to give a credit as 4 quote unquote "director" in whole or 5 in part on any film? 6 MS. HARWIN: Objection to 6 in part on any film? 8 A. Berry Welsh had e-mailed me about being unable to have me 10 credited as director of production. 11 And therefore, offered to give me an 11 gassitant credit, in which I 2 assistant credit, in which I 3 declined to do because it wasnt - 13 at the bottom, which is February 26, 11 it was lower than director of production, and I had spoken to Bob about it. 17 Q. And at the time, Mr. Welsh 16 about it. 18 advised you in the c-mail that HBO prohibited him from doing so, 20 correct? 21 MS. HARWIN: Objection to 16 form. 23 A. I can't recall what was specifically in that e-mail. 24 Q. Okay.  Page 232  Page 233  Fage 234  G. C. ROBINSON  Fage 235  Fage 236  Fage 237  Fage 237  Fage 238  Fage 238  Fage 239  A. Yes, and in the scond  Page shark is what I wrote in the c-mail.  MR. DROGIN: You are objecting to the form of the question.  MR. DROGIN: You are objecting to the form of the question to the form.  MR. DROGIN: You are objecting to the form of the question the form of something she wrote is not something she wrote is not something she wrote is not something she wrote is true?  MS. HARWIN: Objection to the form of the question in the c-mail.  MR. DROGIN: You are objecting to the form of the question in the c-mail.  MR. DROGIN: Okay.  A. That is what I wrote in the c-mail.  MR. DROGIN: I think the question to the c-mail.  MR. DROGIN: Okay.  A. That is what I wrote in the c-mail.  MR. DROGIN: Okay.  A. That is what I wro		Page 230		Page 231
that is what the reason was?  4 quote unquote "director" in whole or in part on any film?  6 MS. HARWIN: Objection to the form.  8 A. Berry Welsh had e-mailed me assistant credit, in which I		G. C. ROBINSON		G. C. ROBINSON
4 quote unquote "director" in whole or in part on any film? 5 in part on any film? 6 MS. HARWIN: Objection to 7 the form. 8 A. Berry Welsh had e-mailed me about being unable to have me 9 about being unable to have me 10 credited as director of production. 11 And therefore, offered to give me an 11 assistant credit, in which 1 12 assistant credit, and it was lower than director of 14 about it. 17 Q. And at the time, Mr. Welsh 17 assistant credit, and unit assistant credit assistant credit, and unit assistant credit, and unit assistant credit a		inform you that they were not able		
form any film?  MS. HARWIN: Objection to the form.  A. Berry Welsh had e-mailed me about being unable to have me credited as director of production.  A. Berry Welsh had e-mailed me about being unable to have me credited as director of production.  A. Berry Welsh had e-mailed me about being unable to have me credited as director of production.  A. Berry Welsh had e-mailed me about being unable to have me and therefore, offered to give me an acceptance of the exhibit called page nine of the exhibit called p	3	to reference you to give a credit as	3	that is what the reason was?
6 MS. HÅRWIN: Objection to 7 the form. 8 A. Beray Welsh had e-mailed me 9 about being unable to have me 10 credited as director of production. 11 And therefore, offered to give me an 11 assistant credit, in which I 12 assistant credit, in which I 13 declined to do because it wasnt— 14 it was lower than director of 15 production, and I had spoken to Bob 16 about it. 17 Q. And at the time, Mr. Welsh 18 advised you in the e-mail that HBO 19 prohibited him from doing so, 20 correct? 21 MS. HARWIN: Objection to 22 the form. 22 the form. 22 A. I can't recall what was 23 A. I can't recall what was 24 specifically in that e-mail. 25 Q. Okay.  Page 232  Page 232  Page 232  Page 233  Page 234  Page 235  Page 235  Page 236  Page 237  Page 238  Page 238  Page 239  Pag		quote unquote "director" in whole or		MS. HARWIN: Objection to
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1	G. C. ROBINSON	1	G. C. ROBINSON
2	true.	2	doing things that were personal or
3	Q. If you could please focus	3	not what the title or the job that
4	your attention on page seven. It is	4	we had discussed that I had hoped to
5	an e-mail from yourself to Bob	5	do. For example, when I was
6	Shepherd, which is Bob. December	6	director of production, he
7	11th, 2017 at 9:55.	7	Q. At the time that you sent
8	Do you see that?	8	this, were you doing budgets deals,
9	A. Yes.	9	logistics, and financial perks?
10	Q. At the time that you sent	10	A. Can I
11	this, in December of 2017, was it	11	MS. HARWIN: Objection to
12	accurate that your job for Canal	12	the form.
13	encompassed production, including	13	Q. That is the question. I am
14	budget, deals, logistics, and	14	not asking for a lengthy narrative
15	financial perks?	15	response over the course of six
16	A. There were times that I	16	months or a year.
17	handled these items for Bob, but one	17	When you sent this e-mail
18	of the biggest issues that I faced	18	to Mr. De Niro, was that correct,
19	is that Bob and I would discuss this	19	were you doing budgets deals,
20	job or being director of production	20	logistics, and financial perks?
21	or VP of finance and what the job	21	A. There were items that he
22	would entail. But it was continuous	22	had directed me to do that
23	where Bob would redirect me, and my	23 24	encompassed those things. But it
24 25	job to do what he directed. And it	25	wasn't something that I did on a
23	was the redirection was always	25	regular basis. He directed me to do
	- 006		
	Page 236		Page 237
1	Page 236	1	Page 237
1	G. C. ROBINSON	1 2	G. C. ROBINSON
2	G. C. ROBINSON them, and then he would direct me to	2	G. C. ROBINSON to do. Whether it was helping to
2 3	G. C. ROBINSON them, and then he would direct me to do something else, as I was trying	2 3	G. C. ROBINSON to do. Whether it was helping to Toukie Smith with her financial
2 3 4	G. C. ROBINSON them, and then he would direct me to do something else, as I was trying to discuss in my last response.	2 3 4	G. C. ROBINSON to do. Whether it was helping to Toukie Smith with her financial items after her
2 3 4 5	G. C. ROBINSON them, and then he would direct me to do something else, as I was trying to discuss in my last response.  Q. So at the time that you	2 3 4 5	G. C. ROBINSON to do. Whether it was helping to Toukie Smith with her financial items after her or, you know, handling talking to
2 3 4 5 6	G. C. ROBINSON them, and then he would direct me to do something else, as I was trying to discuss in my last response. Q. So at the time that you sent this e-mail, were you also	2 3 4 5 6	G. C. ROBINSON to do. Whether it was helping to Toukie Smith with her financial items after her or, you know, handling talking to Bob and having him approve to put
2 3 4 5 6 7	G. C. ROBINSON them, and then he would direct me to do something else, as I was trying to discuss in my last response. Q. So at the time that you sent this e-mail, were you also managing the office, including	2 3 4 5 6 7	G. C. ROBINSON to do. Whether it was helping to Toukie Smith with her financial items after her or, you know, handling talking to Bob and having him approve to put petty cash Excel sheet in the office
2 3 4 5 6 7 8	G. C. ROBINSON them, and then he would direct me to do something else, as I was trying to discuss in my last response. Q. So at the time that you sent this e-mail, were you also managing the office, including oversight, finance, salary/bonuses,	2 3 4 5 6 7 8	G. C. ROBINSON to do. Whether it was helping to Toukie Smith with her financial items after her or, you know, handling talking to Bob and having him approve to put petty cash Excel sheet in the office to sort of track things. These were
2 3 4 5 6 7 8	G. C. ROBINSON them, and then he would direct me to do something else, as I was trying to discuss in my last response. Q. So at the time that you sent this e-mail, were you also managing the office, including oversight, finance, salary/bonuses, HR, and operational issues?	2 3 4 5 6 7 8 9	G. C. ROBINSON to do. Whether it was helping to Toukie Smith with her financial items after her or, you know, handling talking to Bob and having him approve to put petty cash Excel sheet in the office to sort of track things. These were not things that were consistently
2 3 4 5 6 7 8 9	G. C. ROBINSON them, and then he would direct me to do something else, as I was trying to discuss in my last response. Q. So at the time that you sent this e-mail, were you also managing the office, including oversight, finance, salary/bonuses, HR, and operational issues? MS. HARWIN: Can you	2 3 4 5 6 7 8 9	G. C. ROBINSON to do. Whether it was helping to Toukie Smith with her financial items after her or, you know, handling talking to Bob and having him approve to put petty cash Excel sheet in the office to sort of track things. These were not things that were consistently done or regularly done, but they are
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	G. C. ROBINSON them, and then he would direct me to do something else, as I was trying to discuss in my last response. Q. So at the time that you sent this e-mail, were you also managing the office, including oversight, finance, salary/bonuses, HR, and operational issues? MS. HARWIN: Can you clarify where you are in the exhibit? MR. BENNETT: At the bottom of page one, right below the bolded language of the e-mail. It is page seven of the exhibit. MS. HARWIN: Oh. Page seven, not page one. Okay. Q. Do you understand the question, Ms. Robinson?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	G. C. ROBINSON to do. Whether it was helping to Toukie Smith with her financial items after her or, you know, handling talking to Bob and having him approve to put petty cash Excel sheet in the office to sort of track things. These were not things that were consistently done or regularly done, but they are things that I did. As I was trying to explain prior to, there were a lot conversations with Bob where I would have to try to realign my job with what he and I had discussed on the job that I should have been doing, and that I wanted to do where he was redirected me to do things that were in a personal nature and had nothing do with these things. There were many conversations over
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	G. C. ROBINSON them, and then he would direct me to do something else, as I was trying to discuss in my last response. Q. So at the time that you sent this e-mail, were you also managing the office, including oversight, finance, salary/bonuses, HR, and operational issues? MS. HARWIN: Can you clarify where you are in the exhibit? MR. BENNETT: At the bottom of page one, right below the bolded language of the e-mail. It is page seven of the exhibit. MS. HARWIN: Oh. Page seven, not page one. Okay. Q. Do you understand the question, Ms. Robinson? A. Yes. There were items that	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	G. C. ROBINSON to do. Whether it was helping to Toukie Smith with her financial items after her or, you know, handling talking to Bob and having him approve to put petty cash Excel sheet in the office to sort of track things. These were not things that were consistently done or regularly done, but they are things that I did. As I was trying to explain prior to, there were a lot conversations with Bob where I would have to try to realign my job with what he and I had discussed on the job that I should have been doing, and that I wanted to do where he was redirected me to do things that were in a personal nature and had nothing do with these things. There were many conversations over my employment that was was
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	G. C. ROBINSON them, and then he would direct me to do something else, as I was trying to discuss in my last response. Q. So at the time that you sent this e-mail, were you also managing the office, including oversight, finance, salary/bonuses, HR, and operational issues? MS. HARWIN: Can you clarify where you are in the exhibit? MR. BENNETT: At the bottom of page one, right below the bolded language of the e-mail. It is page seven of the exhibit. MS. HARWIN: Oh. Page seven, not page one. Okay. Q. Do you understand the question, Ms. Robinson? A. Yes. There were items that Bob directed me to do that included	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	G. C. ROBINSON to do. Whether it was helping to Toukie Smith with her financial items after her or, you know, handling talking to Bob and having him approve to put petty cash Excel sheet in the office to sort of track things. These were not things that were consistently done or regularly done, but they are things that I did. As I was trying to explain prior to, there were a lot conversations with Bob where I would have to try to realign my job with what he and I had discussed on the job that I should have been doing, and that I wanted to do where he was redirected me to do things that were in a personal nature and had nothing do with these things. There were many conversations over my employment that was was exactly was exactly that.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	G. C. ROBINSON them, and then he would direct me to do something else, as I was trying to discuss in my last response. Q. So at the time that you sent this e-mail, were you also managing the office, including oversight, finance, salary/bonuses, HR, and operational issues? MS. HARWIN: Can you clarify where you are in the exhibit? MR. BENNETT: At the bottom of page one, right below the bolded language of the e-mail. It is page seven of the exhibit. MS. HARWIN: Oh. Page seven, not page one. Okay. Q. Do you understand the question, Ms. Robinson? A. Yes. There were items that	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	G. C. ROBINSON to do. Whether it was helping to Toukie Smith with her financial items after her or, you know, handling talking to Bob and having him approve to put petty cash Excel sheet in the office to sort of track things. These were not things that were consistently done or regularly done, but they are things that I did. As I was trying to explain prior to, there were a lot conversations with Bob where I would have to try to realign my job with what he and I had discussed on the job that I should have been doing, and that I wanted to do where he was redirected me to do things that were in a personal nature and had nothing do with these things. There were many conversations over my employment that was was



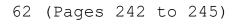


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1		1	
1	G. C. ROBINSON	1	G. C. ROBINSON
2	A. Okay.	2	repeat your question?
3	Q. Sorry, just give me one	3	Q. In July of 2017, were you
4	moment, please. I am going to go	4	looking to leave Canal, were you
5	backwards a little bit. If you	5	looking for alternative employment
6	don't mind, please go to page four.	6	at that time?
7	A. (Witness complies).	7	MS. HARWIN: Objection to
8	Okay.	8	the form.
9	Q. If you look at the second	9	A. No. This was a
10	to last paragraph, this is an e-mail	10	conversation with Bob where I
11	July 18, 2017, at 8:59 p.m.,	11	discussed wanting to eventually
12	correct?	12	transition out of Canal Productions.
13	A. Yes.	13	Q. And as of July 2017, you
14	Q. You see the second to last	14	were telling him that you loved your
15	paragraph, it starts with, "You	15	job and you adored him, correct?
16	know?"	16	MS. HARWIN: Objection to
17	A. Yes, I see that.	17	the form.
18	Q. Okay.	18	A. I understand what that
19	As of July 2017, were you	19	reads, but I think that in working
20	considering or looking for	20	for Bob one of the things that when
21		21	
22	alternative employment outside of	22	you when he agrees to something,
	Canal?		or you approach something like this,
23	MS. HARWIN: Objection to	23	you are always sensitive to how he
24	the form.	24	would react. As I have learned in
25	A. Prior to sorry. Can you	25	the past, how retaliatory he could
	Page 240		Page 241
1	G. C. ROBINSON	1	G. C. ROBINSON
2	be, if you don't approach it in a	2	Q. I am going to represent to
3	way where he has adoration in you	3	you that what appears on pages 14
4	know, being grateful or not	4	and 15 were the attachments to the
5	disrespecting him. So there are	5	e-mails that we just looked at. At
6	lines of that in in this in	6	the time that you wrote this letter
7	this e-mail.	7	and presented it to Mr. De Niro, did
8	Q. Okay. Great.	8	it contain truthful information?
9	Please flip to page 13.	9	MS. HARWIN: Objection to
10		10	the form.
11	Tell me if this is incorrect, that	11	
	you provided a draft recommendation		A. Yes.
12	letter to Mr. De Niro, to consider	12	Q. If you go down to page 18
13	on June 4, 2019?	13	and 19, please.
14	A. I provided a recommendation	14	A. 18 and 19?
15	a draft recommendation letter at	15	Q. Yes.
16	Tom Harvey's request for Bob.	16	A. (Witness complies).
17	Q. Did Tom Harvey tell you to	17	Yes.
18	lie?	18	Q. Is this a draft of the
19	MS. HARWIN: Objection to	19	statement that we just looked at, or
20	the form.	20	is it something different?
21	A. No.	21	A. I don't know.
22	Q. Okay.	22	Q. Did you draft this
	Can you read could you	23	statement?
23	Call you lead could you		
23	·	24	A. I wrote this statement,
	go to page 14 and page 15, please?  A. Okay.		A. I wrote this statement, yes.





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1	G. C. ROBINSON	1	G. C. ROBINSON
2	Q. Is it truthful?	2	(Whereupon, a recess was
3	A. Yes.	3	taken at this time.)
4	MS. HARWIN: Objection to	4	Q. Ms. Robinson, Dan Harvey
5	the form.	5	was hired by Canal in 1991, is that
6	Q. When it comes to the	6	correct?
7	personal work that you have	7	MS. HARWIN: Objection to
8	explained to us at various points	8	the form.
9	throughout today that you performed	9	A. I do not know when Dan
10	for Mr. De Niro, for	10	Harvey was hired by Canal
11		11	Productions.
12	Tiffany, is it your testimony here	12	
13	today that you performed more of	13	Q. Mr. Harvey was credited in
14	that personal work on a yearly basis	14	film productions as Mr. De Niro's
	than managing Canal's office?		trainer, yes or no?
15	MS. HARWIN: Objection to	15	MS. HARWIN: Objection to
16	the form.	16	the form.
17	A. I would say from 2015 on I	17	A. I am not aware of him being
18	handled more personal projects and	18	credited as Mr. De Niro's trainer on
19	items for Bob than I did managing	19	any films.
20	the office.	20	Q. Mr. De Niro and Mr. Harvey
21	Q. Alright.	21	worked together on more than one
22	MR. BENNETT: It is 4:12.	22	hundred films, yes or no?
23	I would like to take a break	23	MS. HARWIN: Objection to
24	until 4:25. 4:25. Thank	24	the form.
25	you.	25	A. I am not aware of how many
	Page 244		Page 245
1	Page 244 G. C. ROBINSON	1	Page 245 G. C. ROBINSON
1 2		1 2	
	G. C. ROBINSON films Dan worked on.	2	G. C. ROBINSON the form.
2	G. C. ROBINSON films Dan worked on. Q. Under any perk budget that		G. C. ROBINSON the form. A. Not formally, no.
2 3	G. C. ROBINSON films Dan worked on. Q. Under any perk budget that Mr. De Niro received during a	2 3	G. C. ROBINSON the form.
2 3 4	G. C. ROBINSON films Dan worked on. Q. Under any perk budget that Mr. De Niro received during a particular film, there were amounts	2 3 4	G. C. ROBINSON the form. A. Not formally, no. Q. You testified earlier, and a few times over the course of
2 3 4 5	G. C. ROBINSON films Dan worked on. Q. Under any perk budget that Mr. De Niro received during a particular film, there were amounts allocated for both personal	2 3 4 5	G. C. ROBINSON the form. A. Not formally, no. Q. You testified earlier, and a few times over the course of today, that you and everyone else
2 3 4 5 6	G. C. ROBINSON films Dan worked on. Q. Under any perk budget that Mr. De Niro received during a particular film, there were amounts allocated for both personal assistant and personal trainer,	2 3 4 5 6	G. C. ROBINSON the form. A. Not formally, no. Q. You testified earlier, and a few times over the course of today, that you and everyone else who work for Canal were essentially
2 3 4 5 6 7	G. C. ROBINSON films Dan worked on. Q. Under any perk budget that Mr. De Niro received during a particular film, there were amounts allocated for both personal assistant and personal trainer, correct?	2 3 4 5 6 7	G. C. ROBINSON the form. A. Not formally, no. Q. You testified earlier, and a few times over the course of today, that you and everyone else who work for Canal were essentially interchangable in that employees
2 3 4 5 6 7 8	G. C. ROBINSON films Dan worked on. Q. Under any perk budget that Mr. De Niro received during a particular film, there were amounts allocated for both personal assistant and personal trainer,	2 3 4 5 6 7 8	G. C. ROBINSON the form. A. Not formally, no. Q. You testified earlier, and a few times over the course of today, that you and everyone else who work for Canal were essentially
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1	G. C. ROBINSON	1	G. C. ROBINSON
2	several reasons, including the	2	not responsive to the
3	the job that Bob and I had discussed	3	question that was posed.
4	that let me start over. What I	4	Q. Ms. Robinson, at the time
5	am trying to say is that in part	5	that you resigned, on April 6, 2019,
6	because of the job that Bob and I	6	you were earning \$300,000 a year
7	had discussed and agreed on that I	7	from Canal, correct?
8	was was not able to completely do	8	MS. HARWIN: Objection to
9	because Bob was redirecting me to	9	the form.
10	other other personal items, such	10	A. I had an annual salary of
11	as, the housing and redirecting	11	300,000.
12	me to that. In addition I had also	12	Q. And Michael Kaplan, as far
13	discussed with Bob in 2008 and 2009,	13	as you can recall, was making 80,000
14	parity and having parity when it	14	per year at that time, correct?
15	came to Dan Harvey. Those are some	15	MS. HARWIN: Objection to
16	of the reasons that come to mind	16	the form.
17	right now.	17	A. I can't recall the exact
18	MR. BENNETT: Sorry. I	18	amount of the salary or compensation
19	had technical issues.	19	he was given at that time.
20	MR. DROGIN: I suggest	20	Q. I am going to represent to
21	you move to strike the answer	21	you that your salary was more than
22	as nonresponsive and ask the	22	three times Mr. Kaplan. And Mr.
23	question again.	23	Kaplan was above Jillian and
24	MR. BENNETT: I will move	24	Sabrina's.
25	to strike the answer if it is	25	The question is this, you
23	to strike the answer if it is	23	The question is this, you
	Page 248		Page 249
1	G. C. ROBINSON	1	G. C. ROBINSON
2	were earning that compensation	2	the form.
3	relative to the remaining personnel	3	A. At times when I was
4	within Canal, Jillian, Sabrina, and	4	directed to, I implemented what I
5	Kaplan, because you were managing	5	policies that I was directed to
6	all of them, correct?	6	implement.
7	A. No.	7	Q. You recommended to Mr. De
8	MS. HARWIN: Objection to	8	Niro that Canal adopt a policy,
9	the form.	9	whereby Canal personnel would be
10	Q. You were making	10	reimbursed on a monthly basis for
11	recommendations to Mr. De Niro about	11	gym memberships, correct?
12	salary increases, office closures,	12	A. I wouldn't necessarily
13	holiday schedules, and related	13	characterize it that way.
14	issues, correct?	14	Q. Okay.
15	MS. HARWIN: Objection to	15	Did you identify or
		16	recommend to Mr. De Niro that Canal
16		1 10	recommend to IVII. De IVIIO mai Canai
16 17	the form.	17	
17	the form. A. I don't think I would	17	consider adopting some of the
17 18	the form.  A. I don't think I would characterize it that way, and I	17 18	consider adopting some of the services that Vantage Point Partners
17 18 19	the form.  A. I don't think I would characterize it that way, and I think some of the items that you	17 18 19	consider adopting some of the services that Vantage Point Partners were offering?
17 18 19 20	the form. A. I don't think I would characterize it that way, and I think some of the items that you said are incorrect.	17 18 19 20	consider adopting some of the services that Vantage Point Partners were offering?  MS. HARWIN: Objection to
17 18 19 20 21	the form. A. I don't think I would characterize it that way, and I think some of the items that you said are incorrect. Q. Okay.	17 18 19 20 21	consider adopting some of the services that Vantage Point Partners were offering?  MS. HARWIN: Objection to the form.
17 18 19 20 21 22	the form. A. I don't think I would characterize it that way, and I think some of the items that you said are incorrect. Q. Okay. And you decided to	17 18 19 20 21 22	consider adopting some of the services that Vantage Point Partners were offering?  MS. HARWIN: Objection to the form.  A. I had discussed Vantage
17 18 19 20 21 22 23	the form. A. I don't think I would characterize it that way, and I think some of the items that you said are incorrect. Q. Okay. And you decided to implement particular policies within	17 18 19 20 21 22 23	consider adopting some of the services that Vantage Point Partners were offering?  MS. HARWIN: Objection to the form.  A. I had discussed Vantage Point benefits with Bob, and he had
17 18 19 20 21 22	the form. A. I don't think I would characterize it that way, and I think some of the items that you said are incorrect. Q. Okay. And you decided to	17 18 19 20 21 22	consider adopting some of the services that Vantage Point Partners were offering?  MS. HARWIN: Objection to the form.  A. I had discussed Vantage





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1	G. C. ROBINSON	1	G. C. ROBINSON
2		2	
3	<ul> <li>Q. And you made certain recommendations to Mr. De Niro,</li> </ul>	3	salary within Canal, correct?  MS. HARWIN: Objection to
4		4	the form.
	correct?		
5	MS. HARWIN: Objection to	5	A. No, that would not be
6	the form.	6	correct.
7	A. Can you clarify what	7	Q. Who else was privy to Canal
8	recommendations or give me examples?	8	personnel salaries?
9	Q. I will withdraw the	9	MS. HARWIN: Objection to
10	question.	10	the form.
11	Jillian and Sabrina would	11	A. They would include Michael
12	send you completed time sheets,	12	Kaplan, Robin Chambers, Mark
13	correct?	13	Bosswick.
14	MS. HARWIN: Objection to	14	Q. Canal personnel I am asking
15	the form.	15	about, not external people.
16	A. Yes, I was asked to collect	16	A. Michael Tasch is not he
17	their time sheets, and send the	17	is employed by sorry. Michael
18	overtime to Burton.	18	Kaplan, Robin Chambers. That is
19	Q. And you would correct them	19	what comes to mind right now.
20	where you noticed mistakes, correct?	20	Q. And you worked regularly
21	A. If I noticed a mistake, I	21	with Peter Grant, correct?
22	would ask them to correct them so	22	MS. HARWIN: Objection to
23	that they were correct.	23	the form.
24	Q. And you and Tasch were the	24	A. It is it varied over the
25	only people who knew everyone's	25	years, depending on Bob's film work
	Page 252		Page 253
1	Page 252 G. C. ROBINSON	1	Page 253 G. C. ROBINSON
2	G. C. ROBINSON and projects.	2	G. C. ROBINSON reporter:
	G. C. ROBINSON	2 3	G. C. ROBINSON
2 3 4	G. C. ROBINSON and projects. Q. Was there ever a time, a year, where you did not work with	2 3 4	G. C. ROBINSON reporter:  Q: And you also worked on an annual basis with
2 3	G. C. ROBINSON and projects. Q. Was there ever a time, a	2 3 4 5	G. C. ROBINSON reporter: Q: And you also worked
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1	-	1	
1	G. C. ROBINSON	1	G. C. ROBINSON
2	be on the film production, correct?	2	them at Bob's direction.
3	MS. HARWIN: Objection to	3	Q. And would you travel to the
4	the form.	4	various film locations before
5	A. I would liaise with the	5	production before filming was
6	production about Bob's crew, and	6	scheduled to commence, to scout it
7	they would be hired by production.	7	out for Mr. De Niro?
8	Q. And you would communicate	8	MS. HARWIN: Objection to
9	with the crew directly regarding	9	the form.
10	various issues that would come up on	10	A. At times I would travel to
11	one or more of the film productions,	11	locations outside of New York to
12	correct?	12	scout hotels and Bob's needs on
13	MS. HARWIN: Objection to	13	productions.
14	the form.	14	Q. And you would interview
15	A. At times, yes.	15	prospective personal assistants,
16	Q. Ernest, Voud (ph), other	16	correct?
17	folks that were included within the	17	MS. HARWIN: Objection to
18	crew, correct?	18	the form.
19	MS. HARWIN: Objection to	19	A. At times I would interview
20	the form.	20	or more meet possible production
21	A. I communicated with them at	21	assistants for Bob.
22	Bob's direction.	22	Q. Thank you.
23	Q. So yes, you communicated	23	Can we just go back to some
24	with them?	24	
25	A. Yes, I communicated with	25	MR. DROGIN: Do you mind
25	A. 1 cs, 1 communicated with	25	WIK. DROOM. Do you lillid
	Page 256		Page 257
1	G. C. ROBINSON	1	G. C. ROBINSON
2	if I ask some questions?	2	MS. HARWIN: Objection to
3	MS. HARWIN: We can't	3	the form.
4	have two different counsel	4	A. I don't recall a time where
5	switching on and off asking	5	he was listed as Bob's personal
6	questions.	6	trainer on
7	MR. DROGIN: Why not?	7	Q. So so let's assume that
8	MS. HARWIN: It is it	8	you don't recall. But if on a
9	is that is not how	9	production, if someone is listed as
10	depositions go. We don't	10	a personal trainer, isn't the
11	switch on and off when	11	company reimbursed for that portion
12	counsel likes. Mr. Bennett	12	of the compensation paid to the
13	is in the middle of asking	13	personal trainer?
14	questions.	14	MS. HARWIN: Objection to
15	MR. DROGIN: There is no	15	the form.
16	rule against it. We didn't	16	Q. Can you answer that? Do
17	stipulate that only one	17	you understand the question?
		1 2	A Can you repeat if place?
18	attorney would ask questions.	18 19	A. Can you repeat if, please?
18 19	attorney would ask questions.  I just want to go back to	19	Q. Sure. I will give you an
18 19 20	attorney would ask questions. I just want to go back to something.	19 20	Q. Sure. I will give you an example.
18 19 20 21	attorney would ask questions. I just want to go back to something. EXAMINATION	19 20 21	Q. Sure. I will give you an example.  Let's say hypothetically
18 19 20 21 22	attorney would ask questions. I just want to go back to something. EXAMINATION BY MR. DROGIN:	19 20 21 22	Q. Sure. I will give you an example.  Let's say hypothetically that Dan Harvey was listed in the
18 19 20 21 22 23	attorney would ask questions. I just want to go back to something. EXAMINATION BY MR. DROGIN: Q. Are you aware of any time	19 20 21 22 23	Q. Sure. I will give you an example.  Let's say hypothetically that Dan Harvey was listed in the perk budget as Bob's personal
18 19 20 21 22	attorney would ask questions. I just want to go back to something. EXAMINATION BY MR. DROGIN:	19 20 21 22	Q. Sure. I will give you an example.  Let's say hypothetically that Dan Harvey was listed in the





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1	G. C. ROBINSON	1	G. C. ROBINSON	- ) - = = = =
2		2		
	Wouldn't that mean that Bob		Q. It was part of the	
3	would be compensated \$50,000 under	3	discussion that you had with him	
4	the perk budget for the personal	4	that was your new title, correct?	
5	trainer?	5	A. Yes.	
6	MS. HARWIN: Objection to	6	Q. Were there any changes to	
7	the form.	7	your job duties and responsibilities	
8	A. I can't really answer that.	8	as a consequence of that title	
9	Q. Okay. Okay. Good.	9	change, any?	
10	Now you were the vice	10	MS. HARWIN: Objection to	
11	president of production and finance,	11	the form.	
12	correct?	12	MR. DROGIN: You can	
13	A. That was the title that I	13	object. You have an	
14	was given at the end of 2017.	14	objection to every word that	
15	Q. You asked for that title,	15	comes out my mouth you can	
16	didn't you, you came up with that	16	object to.	
17	title?	17	Q. Did your job change at all	
18	MS. HARWIN: Objection to	18	other than title?	
19	the form.	19	MS. HARWIN: Objection to	
2.0	Q. Did you come up with that	20	the form.	
21	title?	21	MR. DROGIN: We just went	
22	A. Bob and I discussed several	22	through this.	
23	different titles leading up to the	23	A. My job in the end did not	
24	decision that that would be my	24	really change.	
25	title.	25	Q. Thank you. Who was was	
	Page 260			Page 261
1	Page 260 G. C. ROBINSON	1	G. C. ROBINSON	Page 261
2		2		Page 261
	G. C. ROBINSON		G. C. ROBINSON	Page 261
2	G. C. ROBINSON there a president of production and finance?	2	G. C. ROBINSON objection to the form of it.	Page 261
2 3	G. C. ROBINSON there a president of production and	2 3	G. C. ROBINSON objection to the form of it. You are impeding my ability to ask questions. You have a	Page 261
2 3 4	G. C. ROBINSON there a president of production and finance? A. Could I finish my Q. No. No.	2 3 4	G. C. ROBINSON objection to the form of it. You are impeding my ability to ask questions. You have a standing objection. There is	Page 261
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2 3 4 5 6 7 8	G. C. ROBINSON there a president of production and finance? A. Could I finish my Q. No. No. Was there I am asking the questions. I don't need rambling answers. I don't need rambling answers. I want to get	2 3 4 5 6 7 8	G. C. ROBINSON objection to the form of it. You are impeding my ability to ask questions. You have a standing objection. There is no reason that you should be interrupting my questioning of this witness, and I am going to ask you to stop.	Page 261
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	Page 262		Page 263
1	G. C. ROBINSON	1	G. C. ROBINSON
2	MR. DROGIN: She is	2	including Tom Harvey, Michael Tasch,
3	entitled to finish her answer	3	Mark Bosswick. There were several
4	to the question, not to the	4	people that were senior to me that
5	narrative that she has been	5	made management decisions for Canal.
6	programed to resort to. We	6	Q. And how many of the people
7	all understand it. You have	7	were Canal employees that were
8	made a wonderful record here	8	senior to you?
9	of showing how you can take,	9	A. I would say one, but Bob
10	what should be a short	10	relied on these other people outside
11	deposition, and turn it into	11	of Canal for management in Canal.
12	a long deposition. But now	12	Q. I am not asking about
13	we need to get this	13	non-Canal employees, because
14	consolidated so we can show	14	non-Canal employees are not suing
15	the court how we had to rush	15	him here, or suing Canal here.
16	through to the end after what	16	Who what Canal employee
17	has been going on all day.	17	or employees were above you and
18	Q. Who was above you below Mr.	18	below Mr. De Niro, if any?
19	De Niro?	19	A. I think at times Robin
20	A. They included Robin	20	Chambers and Michael Kaplan, like I
21	Chambers, Michael Kaplan, on certain	21	said. There were
22	subjects or jobs at Canal	22	Q. Okay.
23	Productions, and it also included	23	So and what was Robin
24	people who made decisions on	24	Chambers' compensation, do you know?
25	management for Canal Productions	25	A. I am not aware of what her
	Dago 264		
	Page 264		Page 265
1	G. C. ROBINSON	1	G. C. ROBINSON
1 2		1 2	
	G. C. ROBINSON		G. C. ROBINSON
2 3 4	G. C. ROBINSON compensation was.	2 3 4	G. C. ROBINSON Q. You reported to him and he
2 3	G. C. ROBINSON compensation was. Q. So Robin Chambers was above	2 3	G. C. ROBINSON Q. You reported to him and he directed you, isn't that right?
2 3 4	G. C. ROBINSON compensation was. Q. So Robin Chambers was above you in the organizational chart	2 3 4	G. C. ROBINSON Q. You reported to him and he directed you, isn't that right? A. He directed me in my job
2 3 4 5 6 7	G. C. ROBINSON compensation was. Q. So Robin Chambers was above you in the organizational chart here?	2 3 4 5	G. C. ROBINSON Q. You reported to him and he directed you, isn't that right? A. He directed me in my job duty.
2 3 4 5 6 7 8	G. C. ROBINSON compensation was. Q. So Robin Chambers was above you in the organizational chart here? A. She was senior to me. It wasn't Q. Senior, meaning, the years	2 3 4 5 6 7 8	G. C. ROBINSON Q. You reported to him and he directed you, isn't that right? A. He directed me in my job duty. Q. He told you what to do, isn't that right? A. Yes.
2 3 4 5 6 7 8 9	G. C. ROBINSON compensation was. Q. So Robin Chambers was above you in the organizational chart here? A. She was senior to me. It wasn't Q. Senior, meaning, the years she had worked, or senior in terms	2 3 4 5 6 7 8	G. C. ROBINSON Q. You reported to him and he directed you, isn't that right? A. He directed me in my job duty. Q. He told you what to do, isn't that right? A. Yes. Q. He could change your title
2 3 4 5 6 7 8 9	G. C. ROBINSON compensation was. Q. So Robin Chambers was above you in the organizational chart here? A. She was senior to me. It wasn't Q. Senior, meaning, the years she had worked, or senior in terms of duties and responsibilities, what	2 3 4 5 6 7 8 9	G. C. ROBINSON Q. You reported to him and he directed you, isn't that right? A. He directed me in my job duty. Q. He told you what to do, isn't that right? A. Yes. Q. He could change your title if he wanted, correct?
2 3 4 5 6 7 8 9 10	G. C. ROBINSON compensation was. Q. So Robin Chambers was above you in the organizational chart here? A. She was senior to me. It wasn't Q. Senior, meaning, the years she had worked, or senior in terms	2 3 4 5 6 7 8 9 10	G. C. ROBINSON Q. You reported to him and he directed you, isn't that right? A. He directed me in my job duty. Q. He told you what to do, isn't that right? A. Yes. Q. He could change your title if he wanted, correct? A. Yes.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	G. C. ROBINSON compensation was. Q. So Robin Chambers was above you in the organizational chart here? A. She was senior to me. It wasn't Q. Senior, meaning, the years she had worked, or senior in terms of duties and responsibilities, what does senior mean? MS. HARWIN: Objection to the form. A. Senior means that people that you would go to where Bob would direct you to to help or advise you on certain issues, which is why I also said Tom Harvey and Michael Tasch, which Bob would direct me to those people when it came to management or decisions on Canal when he would not handle them. Q. Weren't you a direct report	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	G. C. ROBINSON Q. You reported to him and he directed you, isn't that right? A. He directed me in my job duty. Q. He told you what to do, isn't that right? A. Yes. Q. He could change your title if he wanted, correct? A. Yes. Q. He could change your compensation if he wanted, correct? A. Yes. Q. He could have fired you if he wanted, correct? A. Yes. Q. He could have fired you if he wanted, correct? A. Yes. Q. He could have changed your duties and responsibilities if he wanted to, right? A. Technically, I guess, yes. Q. And in that regard, he could have changed the duties and

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	_		
1	G. C. ROBINSON	1	G. C. ROBINSON
2	A. Yes.	2	A. If I haven't heard that
3	Q. He was the boss, wasn't he?	3	phrase before, no.
4	A. Yes.	4	Q. Did you view your position
5	Q. Alright. Now we are	5	as one of trust, that Mr. De Niro
6	getting somewhere.	6	had to have trust in you?
7	Now when you became the	7	A. I think like all employees,
8	vice president of production and	8	he had to have trust.
9	finance, did you feel that some	9	Q. And did you trust him?
10	employees were misusing money in	10	A. On certain things, yes. On
11	Canal in the Canal organization?	11	others, no. He was still my
12	A. No, not that I recall.	12	employer.
13	Q. Okay. Great.	13	Q. So you received a letter on
14	Would you agree that during	14	July 11, 2011, from Tom Harvey,
15	your employment you kept copious and	15	right? Sorry. July 11, 2019,
16	voluminous records?	16	right?
17		17	A. Yes.
	A. Yes, I would agree to that	18	
18	statement.		Q. And that was after you
19	Q. Okay.	19	resigned, correct?
20	Do you know the phrase	20	A. Yes.
21	"mind the store," have you ever	21	Q. And you had been trying to
22	heard that phrase?	22	reach Bob to sit down and talk to
23	A. I can't think if I ever	23	him about what had happened, is that
24	heard that phrase before.	24	fair?
25	Q. Do you know what it means?	25	A. Yes, I reached out to him
	Page 268		Page 269
1		1	
1 2	G. C. ROBINSON	1 2	G. C. ROBINSON
2	G. C. ROBINSON on several occasions.	2	G. C. ROBINSON can't recall what the specific lines
2 3	G. C. ROBINSON on several occasions. Q. And he ignored you, right?	2 3	G. C. ROBINSON can't recall what the specific lines were.
2 3 4	G. C. ROBINSON on several occasions. Q. And he ignored you, right? A. He did not respond.	2 3 4	G. C. ROBINSON can't recall what the specific lines were. Q. Okay. Fair enough. Let's
2 3 4 5	G. C. ROBINSON on several occasions. Q. And he ignored you, right? A. He did not respond. Q. So he ignored you, right?	2 3 4 5	G. C. ROBINSON can't recall what the specific lines were. Q. Okay. Fair enough. Let's see go to that letter. I will
2 3 4 5 6	G. C. ROBINSON on several occasions. Q. And he ignored you, right? A. He did not respond. Q. So he ignored you, right? A. Again, I go with my answer,	2 3 4 5 6	G. C. ROBINSON can't recall what the specific lines were. Q. Okay. Fair enough. Let's see go to that letter. I will help you out here.
2 3 4 5 6 7	G. C. ROBINSON on several occasions. Q. And he ignored you, right? A. He did not respond. Q. So he ignored you, right? A. Again, I go with my answer, he did not respond.	2 3 4 5 6 7	G. C. ROBINSON can't recall what the specific lines were. Q. Okay. Fair enough. Let's see go to that letter. I will help you out here. Can you see that, Tom's
2 3 4 5 6 7 8	G. C. ROBINSON on several occasions. Q. And he ignored you, right? A. He did not respond. Q. So he ignored you, right? A. Again, I go with my answer, he did not respond. Q. So when someone doesn't	2 3 4 5 6 7 8	G. C. ROBINSON can't recall what the specific lines were. Q. Okay. Fair enough. Let's see go to that letter. I will help you out here. Can you see that, Tom's letter?
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	D 07/	\	D 071
	Page 270	7	Page 271
1	G. C. ROBINSON	1	G. C. ROBINSON
2	letter?	2	Exhibit D, a Tom Harvey
3	MS. HARWIN: We just need	3	letter, from July 11, 2019,
4	it for the record, the	4	was marked for
5	exhibit number.	5	identification, as of this
6	MR. DROGIN: It is the	6	date.)
7	Harvey letter, from July 11,	7	Q. Now at this point in time
8	2019. Will you stipulate to	8	when you got this letter, were you
9	that?	9	mad at Bob?
10	MS. HARWIN: This is	10	A. I was shocked.
11	Defendant's Exhibit D, is	11	Q. Were you I understand
12	that correct, sir?	12	that.
13	MR. DROGIN: Sure.	13	Were you mad?
14	Whatever yeah. Is it	14	A. I don't know if I would
15	correct is it D, E?	15	characterize it as mad.
16	MR. BENNETT: I think D	16	Q. Okay.
17	is right.	17	As we go on in this letter,
18	MS. HARWIN: Mr. Drogin,	18	there is a couple of things here and
19	please remember to send it to	19	I will go through a bunch of them.
20	the court reporter so that	20	Can you see still see the letter?
21	she has a copy that can be	21	A. Yes.
22	appended to the deposition.	22	(Whereupon, a discussion
23	MR. DROGIN: Very good.	23	was held off the record.)
24	Thank you. We will do that.	24	Q. Now you had not spoken with
25	(Whereupon, ROBINSON	25	Bob since you resigned, is that
	Page 272	2	Page 273
1	Page 272 G. C. ROBINSON	1	Page 273 G. C. ROBINSON
1 2			
	G. C. ROBINSON	1	G. C. ROBINSON
2	G. C. ROBINSON correct?	1 2	G. C. ROBINSON asked her what was
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	G. C. ROBINSON correct?  A. I believe, yes, that is correct. Q. And at the time that you received this letter, you had already conferred with Mr. Pagano, is that right?  MS. HARWIN: Objection. It is privileged.  MR. DROGIN: The fact that she consulted with an attorney when she testified that she conferred with him in March? Do you want to rethink that?  MS. HARWIN: The substance of her communications with counsel are privileged. In so far as, your question has already been answered on the record, there is no need to	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	G. C. ROBINSON asked her what was communicated. My question wasn't answered on the record, and even if it was, I am allowed to ask it a second time. Q. At the time that you received this letter, hadn't you already conferred with Attorney Pagano? A. I had already connected with Jeff Pagano. Q. At the time that you received this letter, you were aware from Robin Chambers that Tiffany Chen was conducting an investigation into the use of Canal's expense report, isn't that right? A. I don't believe that is correct. Q. Well, at some point Robin told you, in substance, hey Tiffany





		Т	
	Page 274		Page 275
1	G. C. ROBINSON	1	G. C. ROBINSON
2	A. I can't recall from a	2	with falsehoods. Is there anything
3	specific conversation that we had	3	in Tom Harvey's letter that is
4	unless	4	correct, or is the entire thing
5	Q. So in general, did you ever	5	false?
6	become aware that Tiffany was asking	6	A. The contents of it is
7		7	
	questions about your use of Canal	1	designed to intimidate me, to has
8	funds?	8	false allegations. It is it is
9	A. My specific use?	9	something that to threaten me, to
10	Q. Yes.	10	discourage me from moving forward
11	A. Not at that time, no.	11	with my claims, that in my in the
12	Q. Okay.	12	e-mail that came with this, it was
13	Were you concerned when you	13	that was sent, it states that I
14	received this letter that Canal	14	will involve an attorney. And it is
15	might be conjuring up some sort of	15	also somebody who wrote this, Tom
16	false claims against you?	16	Harvey, who was aware of my claims
17	A. Yes, because it is filled	17	and the harassment.
18	with nothing but false allegations,	18	Q. Okay. And just getting
19	and it is also	19	back to what I was asking.
20	Q. Hold on. Can you so	20	Is there anything in this
21	look at the letter, is there	21	letter that is accurate or is it all
22	anything	22	false?
23	A. Can I finish my responses?	23	A. Are you asking me to go
24	Q. No. Your attorney can ask	24	through every single line of it?
25	questions. You said it was filled	25	Q. You have said that it is
2.5	questions. Tou said it was fifted	23	Q. I ou have said that it is
	Page 276		Page 277
1	G. C. ROBINSON	1	G. C. ROBINSON
2	filled with falsehoods. I am just	2	they wanted to. I am going to ask
3	wondering if anything in it is true,	3	you if you recall giving her this
4			
	or is that just an evaggeration on		
	or is that just an exaggeration on	4	example. You said that let me
5	your part?	4 5	example. You said that let me break it down.
5 6	your part? A. The claims that Tom Harvey	4 5 6	example. You said that let me break it down.  Wasn't there a time when,
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	Page 278		Page 279
1		1	
1	G. C. ROBINSON	1	G. C. ROBINSON
2 3	your position as vice president of	2	court. I am asking a different
4	production and finance?	3 4	question. You keep saying he is
5	A. Can you clarify in regards		directing and redirecting.
6	to are you	5 6	Do you have any independent
7	<ul><li>Q. Well</li><li>A. What specifically?</li></ul>	7	authority, do you have any autonomy,
8	Q. Sure. I will clarify.	8	do you do anything other than what he tells you to do?
9	You keep saying that Bob	9	MS. HARWIN: She should
10	directed you. And it is a theme	10	be allowed to answer the
11	that you keep coming back to. Bob	11	question.
12	directed you. Bob directed all	12	MR. DROGIN: I just asked
13	these people.	13	the question.
14	Did you have any	14	A. It was very difficult to
15	independent autonomy to do anything,	15	have autonomy based on environment
16	or were you just there to jump when	16	and the environment that Bob had
17	he said jump and that was it?	17	created. I spoke to him at length
18	A. As I said before, and I	18	about, you know, every topic and
19	will give the example that Bob would	19	everything that was going on with
20	continue to redirect my job to	20	Canal. One of my complaints was
21	(Simultaneous speaking)	21	that
22	Q. I know. I would like to	22	Q. Stop. Please. I haven't
23	redirect you back to my question.	23	ask you about your complaints. This
24	You keep repeating this theme again	24	is what you are doing. I don't want
25	and we will explain this to the	25	to hear about your complaints. I
		1	
	Page 280		Page 281
1	Page 280 G. C. ROBINSON	1	Page 281 G. C. ROBINSON
1 2		1 2	
	G. C. ROBINSON		G. C. ROBINSON you, is that fair? Is that fair, he was micromanaging you?
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	Page 282		Page 283
1	G. C. ROBINSON	1	G. C. ROBINSON
2	cleaner level with you.	2	pretty much every question that I
3	Now didn't you tell Robin	3	ask you is based on your own words.
4	that if one of the Dysons hadn't	4	That is what we are going to use
5	been delivered, someone could have	5	against you here. Your own words.
6	accused you of stealing it?	6	Now Tom's letter identified
7	A. I am not aware of that. I	7	a number of items that he believed
8	can't recall off the top of my head.	8	you had improperly charged to Canal
9	Q. But when we are talking	9	as personal expenses.
10	about conjuring up claims, and you	10	Is that fair that that is
11	said there was a concern that you	11	what it says? I know you don't
12	had, that they were going to conjure	12	agree with it.
13		13	A. Those are claims that he
14	up claims against you, is that the	14	made, yes.
15	type of thing that you meant?	15	
	A. I am not aware or I can't		Q. You did have access to
16 17	recall that specific conversation so	16 17	Canal's American Express card,
	unless you can, you know I can	18	didn't you?
18	see it within the context or that	18	A. Yes. As did other
19	there was a conversation there, I		employees.
20	can't really quite	20	Q. Yes. But for the moment I
21	Q. That is okay. I assure you	21	am just going to confine myself to
22	there is a conversation there. I	22	you. Okay? Okay?
23	wouldn't be bringing these things up	23	A. Okay.
24	if there wasn't a conversation	24	Q. Did you have access to any
25	there. You should assume that	25	other corporate credit cards or
	Page 284		Page 285
1		1	
1 2	Page 284 G. C. ROBINSON debit cards?	1 2	Page 285 G. C. ROBINSON it?
2	G. C. ROBINSON	2	G. C. ROBINSON it?
2 3	G. C. ROBINSON debit cards? A. Yes.	2 3	G. C. ROBINSON it?  A. The main account holder and
2 3 4	G. C. ROBINSON debit cards? A. Yes. Q. Okay.	2 3 4	G. C. ROBINSON it? A. The main account holder and credit card was under Robert De
2 3 4 5	G. C. ROBINSON debit cards? A. Yes. Q. Okay. And what were they?	2 3 4 5	G. C. ROBINSON it? A. The main account holder and credit card was under Robert De Niro. There was several credit
2 3 4 5 6	G. C. ROBINSON debit cards? A. Yes. Q. Okay. And what were they? A. I had access to Toukie	2 3 4 5 6	G. C. ROBINSON it? A. The main account holder and credit card was under Robert De Niro. There was several credit cards for Bob's business,
2 3 4 5 6 7	G. C. ROBINSON debit cards? A. Yes. Q. Okay. And what were they? A. I had access to Toukie Smith's Canal American Express,	2 3 4 5 6 7	G. C. ROBINSON it? A. The main account holder and credit card was under Robert De Niro. There was several credit cards for Bob's business, operational business needs, or
2 3 4 5 6 7 8	G. C. ROBINSON debit cards? A. Yes. Q. Okay. And what were they? A. I had access to Toukie Smith's Canal American Express, Michael Kaplan. These were all	2 3 4 5 6 7 8	G. C. ROBINSON it?  A. The main account holder and credit card was under Robert De Niro. There was several credit cards for Bob's business, operational business needs, or expenses, operational, personal.
2 3 4 5 6 7 8 9	G. C. ROBINSON debit cards? A. Yes. Q. Okay. And what were they? A. I had access to Toukie Smith's Canal American Express, Michael Kaplan. These were all things that Michael Kaplan	2 3 4 5 6 7 8	G. C. ROBINSON it?  A. The main account holder and credit card was under Robert De Niro. There was several credit cards for Bob's business, operational business needs, or expenses, operational, personal. Dan Harvey had a credit card, Canal
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	G. C. ROBINSON debit cards? A. Yes. Q. Okay. And what were they? A. I had access to Toukie Smith's Canal American Express, Michael Kaplan. These were all things that Michael Kaplan specifically that other employees had. And also Toukie Smith as well. Q. But are these Canal American Express cards with individual users, is that what you are saying? A. Yes. Q. There was also a master account, correct? A. Yes. Q. And you were the one that had access to the master account, correct?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	G. C. ROBINSON  it?  A. The main account holder and credit card was under Robert De  Niro. There was several credit cards for Bob's business, operational business needs, or expenses, operational, personal.  Dan Harvey had a credit card, Canal American Express's credit card, and also Toukie Smith, Bob's ex-girlfriend had a Canal American Express.  Q. Did you have any responsibilities regarding the use of this American Express card, like paying the bills or verifying charges, or anything like that?  A. Both Michael Kaplan and I reviewed bills when they were sent to us.  Q. For what purpose did you

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		1	
	Page 286		Page 287
1	G. C. ROBINSON	1	G. C. ROBINSON
2	weren't the only people who had eyes	2	Q. So sometimes mistakes would
3	on the American Express card.	3	be made, and we should be able to
4	Q. Did you ever sit down with	4	identify what you reimbursed Canal
5	Dan Harvey to review the American	5	for by looking at the records,
6	Express bills?	6	correct?
7	A. No.	7	A. At the at the
8	Q. Now, on occasion, would you	8	reimbursements or the refund on it
9	ever charge personal expenses on the	9	if I had made a mistake, which I can
10	American Express card?	10	recall one, I in addition there
11	A. I can't recall a time where	11	was a check that I had sent to
12	I would have placed anything that	12	Burton for something that I had seen
13	was personal unless it was an	13	that I had charged accidentally to
14	accident.	14	the credit card. I had sent Burton
15	Q. And if it was an accident,	15	a check.
16	assuming it happened, you would	16	Q. I am not suggesting there
17	reimburse Canal, is that fair?	17	is anything wrong with that.
18	A. I would, and I have	18	Sometimes I have a firm credit
19	reimbursed Canal for an accidental	19	card, and sometimes I use it and I
20	charge that I can recall. And I	20	reimburse the firm. I am not
21	also reversed charges when I	21	suggesting that you did anything
22	realized the mistake I had made.	22	wrong. I am just saying that
23	Both my American Express and Canal's	23	sometimes there might be personal
24	American Express look exactly the	24	expenses on there, and there would
25	same.	25	be a reason for it, correct?
25	same.	25	oc a reason for it, correct:
	Page 288		Page 289
1	G. C. ROBINSON	1	G. C. ROBINSON
2	A. I can't recall what	2	SkyMiles account, is that right?
3	personal expenses I would have put	3	A. There were several Delta
4	on Canal production credit card.	4	accounts, including one for Robert
5	Q. So is it fair to assume	5	De Niro, one that was mine, and one
6	that if there were charges put on	6	for Dan Harvey.
7	the Canal American Express they were	7	Q. Okay.
8	business expenses, correct?	8	And one of the perks that
9	A. They were business	9	you had during your employment was
10	expenses, or related to Canal, or	10	if you were traveling, personally,
11	something that had an expense that	11	on vacation, or something like that,
12	Bob had approved.	12	you could use Canal's SkyMiles,
13	Q. Okay.	13	isn't that right?
14	Let me turn now to one of	14	A. I wouldn't characterize it
15	the things that Tom talks about in	15	that way, but one I wouldn't
16	his letter and that is SkyMiles.	16	characterize it that way.
17	Am I correct that the use	17	Q. Well, you did during
18	of the American Express credit card	18	your employment, you did use Canal's
19	would generate credits or points	19	SkyMiles, didn't you?
20	that could then be converted in	20	A. Yes, that and Bob
21	Delta SkyMiles, is that fair?	21	approved of that.
22	A. Yes, American Express	22	Q. That was part of your
23	credit cards.	23	employment was that one of the perks
24	Q. And Canal had a SkyMiles	24	was you could travel on Canal's
2 1			
25	account, and then you had your own	25	SkyMiles, do I understand that

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1 G. C. ROBINSON 2 right? 3 A. Yes, with Bob's it was 4 approved by Bob. 5 Q. Was that in writing 6 anywhere? I am not questioning that 7 that existed. I am asking if it was 8 memorialized in writing anywhere 9 because I know you made copious 10 notes and records on things. 11 A. I can't recall any specific 12 e-mails or it being written.	G. C. ROBINSON Q. Now at some point, in January of 2019, you placed a call and asked about the maximum number of SkyMiles that could be transferred from one account to another, isn't that right? A. I can't recall my specific conversation with American Express at that time. Q. Do you know how many SkyMiles could be transferred in any
Q. Okay. You knew about this, and Bob knew about this, is that right? A. Yes. Q. Who else, if anyone, knew about that arrangement? A. Michael Kaplan they include Michael Kaplan, Robin Chambers, I believe Olivia was aware. I believe some of the executive assistants were aware. Michael Tasch, Mark Bosswick, and also Tom Harvey.	13 24-hour period? 14 A. 999,000. 15 Q. Per day? 16 A. Per day. 17 Q. How do you know that? 18 A. It was something it had 19 come up in a conversation when I was 20 trying to transfer points with Delta 21 at some point. 22 Q. And in beginning of January 23 of 2019, up until the date that you 24 resigned, did you, in fact, transfer 25 some Canal SkyMiles into your
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G. C. ROBINSON personal SkyMiles account?  A. Yes, as I said as I had done with Bob's approval. Q. When you say as you had done, isn't it true that when you use them, on some occasions, you would transfer the actual amount that you needed for the particular airplane flight or whatever it was?  A. No, that is not correct. Q. So each time you needed to use SkyMiles, you would just move yop9,000, is that right? A. No, that is not correct. Q. So then, before January of 2019, if you needed a certain number of SkyMiles, how would you go about transferring them into your account? A. I would transfer the balance of the SkyMiles into my account, at times where Bob and I had discussed, and he had approved of my trip and my travel. Q. Okay.	And would you transfer the amount that you needed or just whatever amount you saw fit? A. I wouldn't characterize it that way. Q. Well, was there any limitation on the number of SkyMiles that you would use for a particular trip where he had approved the use of it? A. I would transfer the balance of the SkyMiles account into my Delta account. Q. So are you saying you would empty Canal's SkyMiles account into your personal account, is that what you are saying? A. It is the same that Michael Kaplan did when he transferred them out of Bob's black card into Bob's Delta SkyMiles. It was we would transfer what was available. Q. I am just talking about





	Dama 204		Da wa 205
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1	G. C. ROBINSON	1	G. C. ROBINSON
2	whatever arrangement Michael Kaplan	2	refresh your recollection you have
3	might have had.	3	about transfers that you made
4	Do you know how many	4	between January and the day that you
5	SkyMiles you transferred from	5	resigned?
6	Canal's account to your personal	6	A. I don't know specifically
7	account between January of 2019, and	7	as I said to the amounts the
8	the day that you resigned?	8	amount of points that were
9	A. I don't know the amount.	9	transferred.
10	Q. Okay.	10	Q. Okay.
11	Would it surprise you if I	11	But you were transferring
12	told you the records show that you	12	miles to your personal account,
13	transferred just under 4.5 million	13	correct?
14	SkyMiles?	14	A. Yes, with Bob's approval.
15	A. I don't know the amount.	15	Q. You are saying that he had
16	Q. I understand that. My	16	made specific approval for each of
17	question is I will ask it a	17	those transfers, what are you
18	different way.	18	saying?
19	There were five transfers	19	A. For the overall of
20	of 999,000 SkyMiles made from the	20	transferring the points into my
21	Canal account to your personal	21	Delta SkyMiles account, he and I had
22	account, between January 28, 2019,	22	discussed it on multiple occasions,
23	and March 18th, 2019.	23	including a time in I believe in
24	Does that refresh your	24	2019, where Bob, himself, was
25	recollection any does that	25	frustrated that I did not have the
	Page 296		Page 297
1	G. C. ROBINSON	1	G. C. ROBINSON
2	access to transfer miles.	2	Q. Do you recall having any
3	Q. Let's go back to my	3	conversations with Robin where you
4	question. Let's go back to January	4	were talking about resigning during
5	of 2019.	5	that period of time?
6	During the period of time	6	A. During the period, just to
7	in January, that was the point in	7	clarify, January through April?
8	time that you were you testified	8	Q. January 28th, 2019, which
9	you were in such acute pain because	9	was the day of the first transfer,
10	of your back. Weren't you also	10	up until April 6th, which was the
11	talking to Robin Chambers about the	11	day of your resignation?
12	fact that you were thinking about	12	A. I can't recall a
13	resigning?	13	conversation with her about it about
14	A. No.	14	resigning. It was a very toxic and
15	Q. During the period of time	15	abusive work environment, but and
16	that transfers were made, between	16	I was in pain, but I don't recall
17	January and the time that you	17	specifically talking to her about
18	resigned, weren't you contemplating	18	resigning because I didn't I
19	resigning?	19	didn't think about resigning my
20	A. No, quite the opposite. I	20	position until much later.
21	was trying to reach out to my	21	Q. And was there ever a
22	employer to fix any issues and speak	22	conversation with you and Mr. De
23	to him about any problems. I had	23	Niro about what would happen to
24	reached out to him several times	24	SkyMiles after you left the company,
25	about that.	25	did that ever come up?





	B 000		D 000
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1	G. C. ROBINSON	1	G. C. ROBINSON
2	A. I can't recall us ever	2	Q. I am not asking about that.
3	discussing that.	3	Please don't tell me about Tom
4	Q. Do you recall having a	4	Harvey. If you remember it I can
5	conversation with Robin Chambers	5	play it for you if you want.
6	where you told her that Tom Harvey	6	Do you remember a
7	had accused you of stealing	7	conversation with Robin Chambers,
8	SkyMiles?	8	where you told her, "Tom Harvey is
9	A. There was a conversation at	9	accusing me of stealing the
10	some point where Tom Harvey had told	10	SkyMiles?"
11	me that Bob was upset about the	11	A. I don't recall the exact
12	SkyMiles, and also said that he knew	12	words that I used that I had
13	that I used them.	13	discussed with her about the
14	Q. I know all of that. But I	14	SkyMiles.
15	am talking about the conversation	15	Q. I am not asking for the
16	a conversation you had with Robin	16	exact words. I am just asking if
17	Chambers, where you explained to her	17	you remember having a conversation
18	that Tom Harvey was accusing you of	18	with her about it.
19	stealing the SkyMiles. Do you have	19	A. I believe I just answered
20	any recollection of that	20	that, and said that I do recall a
21	conversation?	21	conversation where we discussed the
22	A. I have recollection of a	22	SkyMiles.
23	conversation about the SkyMiles	23	Q. And didn't she tell you,
24	after I got off the phone with Tom	24	"Chase, it is like a computer, you
25	Harvey, where he	25	can use it while you are working,
	•		<b>,</b> 5
	Page 300		Page 301
1	_	1	_
1 2	G. C. ROBINSON		G. C. ROBINSON
2	G. C. ROBINSON but you can't take it with you,"	2	G. C. ROBINSON are working, but you can't take it
2 3	G. C. ROBINSON	2 3	G. C. ROBINSON are working, but you can't take it with you," that is not something
2 3 4	G. C. ROBINSON but you can't take it with you," isn't that what she told you? A. I can't recall the	2 3 4	G. C. ROBINSON are working, but you can't take it with you," that is not something that you see? You see it
2 3	G. C. ROBINSON but you can't take it with you," isn't that what she told you? A. I can't recall the specifics of what he she said, but I	2 3	G. C. ROBINSON are working, but you can't take it with you," that is not something that you see? You see it differently, is that correct?
2 3 4 5	G. C. ROBINSON but you can't take it with you," isn't that what she told you? A. I can't recall the specifics of what he she said, but I wouldn't characterize it in that way	2 3 4 5	G. C. ROBINSON are working, but you can't take it with you," that is not something that you see? You see it differently, is that correct? A. No. As I said, I wouldn't
2 3 4 5 6	G. C. ROBINSON but you can't take it with you," isn't that what she told you? A. I can't recall the specifics of what he she said, but I wouldn't characterize it in that way myself.	2 3 4 5 6	G. C. ROBINSON are working, but you can't take it with you," that is not something that you see? You see it differently, is that correct? A. No. As I said, I wouldn't characterize it that way because
2 3 4 5 6 7	G. C. ROBINSON but you can't take it with you," isn't that what she told you? A. I can't recall the specifics of what he she said, but I wouldn't characterize it in that way	2 3 4 5 6 7	G. C. ROBINSON are working, but you can't take it with you," that is not something that you see? You see it differently, is that correct? A. No. As I said, I wouldn't characterize it that way because SkyMiles are not a computer. And
2 3 4 5 6 7 8	G. C. ROBINSON but you can't take it with you," isn't that what she told you? A. I can't recall the specifics of what he she said, but I wouldn't characterize it in that way myself. Q. Well, if you can't tell me the specifics of what she said, how	2 3 4 5 6 7 8	G. C. ROBINSON are working, but you can't take it with you," that is not something that you see? You see it differently, is that correct? A. No. As I said, I wouldn't characterize it that way because
2 3 4 5 6 7 8 9	G. C. ROBINSON but you can't take it with you," isn't that what she told you? A. I can't recall the specifics of what he she said, but I wouldn't characterize it in that way myself. Q. Well, if you can't tell me	2 3 4 5 6 7 8 9	G. C. ROBINSON are working, but you can't take it with you," that is not something that you see? You see it differently, is that correct? A. No. As I said, I wouldn't characterize it that way because SkyMiles are not a computer. And once you transfer the SkyMiles, you cannot transfer them back.
2 3 4 5 6 7 8 9	G. C. ROBINSON but you can't take it with you," isn't that what she told you? A. I can't recall the specifics of what he she said, but I wouldn't characterize it in that way myself. Q. Well, if you can't tell me the specifics of what she said, how can you tell me how you would characterize it?	2 3 4 5 6 7 8 9	G. C. ROBINSON are working, but you can't take it with you," that is not something that you see? You see it differently, is that correct? A. No. As I said, I wouldn't characterize it that way because SkyMiles are not a computer. And once you transfer the SkyMiles, you cannot transfer them back. Q. Okay.
2 3 4 5 6 7 8 9 10	G. C. ROBINSON but you can't take it with you," isn't that what she told you? A. I can't recall the specifics of what he she said, but I wouldn't characterize it in that way myself. Q. Well, if you can't tell me the specifics of what she said, how can you tell me how you would characterize it? A. Because you just quoted	2 3 4 5 6 7 8 9 10	G. C. ROBINSON are working, but you can't take it with you," that is not something that you see? You see it differently, is that correct? A. No. As I said, I wouldn't characterize it that way because SkyMiles are not a computer. And once you transfer the SkyMiles, you cannot transfer them back. Q. Okay. So since you can't transfer
2 3 4 5 6 7 8 9 10 11	G. C. ROBINSON but you can't take it with you," isn't that what she told you? A. I can't recall the specifics of what he she said, but I wouldn't characterize it in that way myself. Q. Well, if you can't tell me the specifics of what she said, how can you tell me how you would characterize it? A. Because you just quoted her, supposedly, in saying that it	2 3 4 5 6 7 8 9 10 11	G. C. ROBINSON are working, but you can't take it with you," that is not something that you see? You see it differently, is that correct? A. No. As I said, I wouldn't characterize it that way because SkyMiles are not a computer. And once you transfer the SkyMiles, you cannot transfer them back. Q. Okay. So since you can't transfer them back, is it fair to say that
2 3 4 5 6 7 8 9 10 11 12 13	G. C. ROBINSON but you can't take it with you," isn't that what she told you? A. I can't recall the specifics of what he she said, but I wouldn't characterize it in that way myself. Q. Well, if you can't tell me the specifics of what she said, how can you tell me how you would characterize it? A. Because you just quoted her, supposedly, in saying that it was like a computer. So I don't	2 3 4 5 6 7 8 9 10 11 12 13	G. C. ROBINSON are working, but you can't take it with you," that is not something that you see? You see it differently, is that correct? A. No. As I said, I wouldn't characterize it that way because SkyMiles are not a computer. And once you transfer the SkyMiles, you cannot transfer them back. Q. Okay. So since you can't transfer
2 3 4 5 6 7 8 9 10 11 12 13	G. C. ROBINSON but you can't take it with you," isn't that what she told you? A. I can't recall the specifics of what he she said, but I wouldn't characterize it in that way myself. Q. Well, if you can't tell me the specifics of what she said, how can you tell me how you would characterize it? A. Because you just quoted her, supposedly, in saying that it was like a computer. So I don't characterize the SkyMiles in that	2 3 4 5 6 7 8 9 10 11 12 13	G. C. ROBINSON are working, but you can't take it with you," that is not something that you see? You see it differently, is that correct?  A. No. As I said, I wouldn't characterize it that way because SkyMiles are not a computer. And once you transfer the SkyMiles, you cannot transfer them back. Q. Okay. So since you can't transfer them back, is it fair to say that you never tried to transfer them back?
2 3 4 5 6 7 8 9 10 11 12 13 14 15	G. C. ROBINSON but you can't take it with you," isn't that what she told you? A. I can't recall the specifics of what he she said, but I wouldn't characterize it in that way myself. Q. Well, if you can't tell me the specifics of what she said, how can you tell me how you would characterize it? A. Because you just quoted her, supposedly, in saying that it was like a computer. So I don't characterize the SkyMiles in that way. Once you transfer the SkyMiles	2 3 4 5 6 7 8 9 10 11 12 13 14 15	G. C. ROBINSON are working, but you can't take it with you," that is not something that you see? You see it differently, is that correct? A. No. As I said, I wouldn't characterize it that way because SkyMiles are not a computer. And once you transfer the SkyMiles, you cannot transfer them back. Q. Okay. So since you can't transfer them back, is it fair to say that you never tried to transfer them back? A. At this time once I had had
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	G. C. ROBINSON but you can't take it with you," isn't that what she told you? A. I can't recall the specifics of what he she said, but I wouldn't characterize it in that way myself. Q. Well, if you can't tell me the specifics of what she said, how can you tell me how you would characterize it? A. Because you just quoted her, supposedly, in saying that it was like a computer. So I don't characterize the SkyMiles in that way. Once you transfer the SkyMiles you can't transfer them back.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	G. C. ROBINSON are working, but you can't take it with you," that is not something that you see? You see it differently, is that correct? A. No. As I said, I wouldn't characterize it that way because SkyMiles are not a computer. And once you transfer the SkyMiles, you cannot transfer them back. Q. Okay. So since you can't transfer them back, is it fair to say that you never tried to transfer them back? A. At this time once I had had Tom Harvey had sent this letter,
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	G. C. ROBINSON but you can't take it with you," isn't that what she told you? A. I can't recall the specifics of what he she said, but I wouldn't characterize it in that way myself. Q. Well, if you can't tell me the specifics of what she said, how can you tell me how you would characterize it? A. Because you just quoted her, supposedly, in saying that it was like a computer. So I don't characterize the SkyMiles in that way. Once you transfer the SkyMiles you can't transfer them back. Q. Right.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	G. C. ROBINSON are working, but you can't take it with you," that is not something that you see? You see it differently, is that correct? A. No. As I said, I wouldn't characterize it that way because SkyMiles are not a computer. And once you transfer the SkyMiles, you cannot transfer them back. Q. Okay. So since you can't transfer them back, is it fair to say that you never tried to transfer them back? A. At this time once I had had Tom Harvey had sent this letter, anything that I had discussed about
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	G. C. ROBINSON but you can't take it with you," isn't that what she told you? A. I can't recall the specifics of what he she said, but I wouldn't characterize it in that way myself. Q. Well, if you can't tell me the specifics of what she said, how can you tell me how you would characterize it? A. Because you just quoted her, supposedly, in saying that it was like a computer. So I don't characterize the SkyMiles in that way. Once you transfer the SkyMiles you can't transfer them back. Q. Right. So what you are telling me	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	G. C. ROBINSON are working, but you can't take it with you," that is not something that you see? You see it differently, is that correct? A. No. As I said, I wouldn't characterize it that way because SkyMiles are not a computer. And once you transfer the SkyMiles, you cannot transfer them back. Q. Okay. So since you can't transfer them back, is it fair to say that you never tried to transfer them back? A. At this time once I had had Tom Harvey had sent this letter, anything that I had discussed about the SkyMiles would be privileged.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	G. C. ROBINSON but you can't take it with you," isn't that what she told you? A. I can't recall the specifics of what he she said, but I wouldn't characterize it in that way myself. Q. Well, if you can't tell me the specifics of what she said, how can you tell me how you would characterize it? A. Because you just quoted her, supposedly, in saying that it was like a computer. So I don't characterize the SkyMiles in that way. Once you transfer the SkyMiles you can't transfer them back. Q. Right. So what you are telling me then I want to make sure I	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	G. C. ROBINSON are working, but you can't take it with you," that is not something that you see? You see it differently, is that correct? A. No. As I said, I wouldn't characterize it that way because SkyMiles are not a computer. And once you transfer the SkyMiles, you cannot transfer them back. Q. Okay. So since you can't transfer them back, is it fair to say that you never tried to transfer them back? A. At this time once I had had Tom Harvey had sent this letter, anything that I had discussed about the SkyMiles would be privileged. Q. I am not understanding your
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	G. C. ROBINSON but you can't take it with you," isn't that what she told you? A. I can't recall the specifics of what he she said, but I wouldn't characterize it in that way myself. Q. Well, if you can't tell me the specifics of what she said, how can you tell me how you would characterize it? A. Because you just quoted her, supposedly, in saying that it was like a computer. So I don't characterize the SkyMiles in that way. Once you transfer the SkyMiles you can't transfer them back. Q. Right. So what you are telling me then I want to make sure I understand what is going on in your	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	G. C. ROBINSON are working, but you can't take it with you," that is not something that you see? You see it differently, is that correct? A. No. As I said, I wouldn't characterize it that way because SkyMiles are not a computer. And once you transfer the SkyMiles, you cannot transfer them back. Q. Okay. So since you can't transfer them back, is it fair to say that you never tried to transfer them back? A. At this time once I had had Tom Harvey had sent this letter, anything that I had discussed about the SkyMiles would be privileged. Q. I am not understanding your answer. Did you ever try to
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	G. C. ROBINSON but you can't take it with you," isn't that what she told you? A. I can't recall the specifics of what he she said, but I wouldn't characterize it in that way myself. Q. Well, if you can't tell me the specifics of what she said, how can you tell me how you would characterize it? A. Because you just quoted her, supposedly, in saying that it was like a computer. So I don't characterize the SkyMiles in that way. Once you transfer the SkyMiles you can't transfer them back. Q. Right. So what you are telling me then I want to make sure I understand what is going on in your head.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	G. C. ROBINSON are working, but you can't take it with you," that is not something that you see? You see it differently, is that correct? A. No. As I said, I wouldn't characterize it that way because SkyMiles are not a computer. And once you transfer the SkyMiles, you cannot transfer them back. Q. Okay. So since you can't transfer them back, is it fair to say that you never tried to transfer them back? A. At this time once I had had Tom Harvey had sent this letter, anything that I had discussed about the SkyMiles would be privileged. Q. I am not understanding your answer. Did you ever try to transfer them back is the question
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	G. C. ROBINSON but you can't take it with you," isn't that what she told you? A. I can't recall the specifics of what he she said, but I wouldn't characterize it in that way myself. Q. Well, if you can't tell me the specifics of what she said, how can you tell me how you would characterize it? A. Because you just quoted her, supposedly, in saying that it was like a computer. So I don't characterize the SkyMiles in that way. Once you transfer the SkyMiles you can't transfer them back. Q. Right. So what you are telling me then I want to make sure I understand what is going on in your head. If Robin told you, in	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	G. C. ROBINSON are working, but you can't take it with you," that is not something that you see? You see it differently, is that correct?  A. No. As I said, I wouldn't characterize it that way because SkyMiles are not a computer. And once you transfer the SkyMiles, you cannot transfer them back.  Q. Okay.  So since you can't transfer them back, is it fair to say that you never tried to transfer them back?  A. At this time once I had had Tom Harvey had sent this letter, anything that I had discussed about the SkyMiles would be privileged.  Q. I am not understanding your answer. Did you ever try to transfer them back is the question simply, yes or no?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	G. C. ROBINSON but you can't take it with you," isn't that what she told you? A. I can't recall the specifics of what he she said, but I wouldn't characterize it in that way myself. Q. Well, if you can't tell me the specifics of what she said, how can you tell me how you would characterize it? A. Because you just quoted her, supposedly, in saying that it was like a computer. So I don't characterize the SkyMiles in that way. Once you transfer the SkyMiles you can't transfer them back. Q. Right. So what you are telling me then I want to make sure I understand what is going on in your head.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	G. C. ROBINSON are working, but you can't take it with you," that is not something that you see? You see it differently, is that correct? A. No. As I said, I wouldn't characterize it that way because SkyMiles are not a computer. And once you transfer the SkyMiles, you cannot transfer them back. Q. Okay. So since you can't transfer them back, is it fair to say that you never tried to transfer them back? A. At this time once I had had Tom Harvey had sent this letter, anything that I had discussed about the SkyMiles would be privileged. Q. I am not understanding your answer. Did you ever try to transfer them back is the question

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	Page 302		Page 303
-1	-		
1	G. C. ROBINSON	1	G. C. ROBINSON
2	therefore, I didn't try to transfer	2	from transferring SkyMiles as
3	them back on something that I knew	3	you know I am aware.
4	could not be transferred back.	4	(Simultaneous speaking)
5	Q. And again, Tom's letter, at	5	Q. It's like Hilton. You get
6	the bottom of page one, he wrote, "I	6	on the phone, where you have a
7	strongly suggest you speak to an	7	reservation, and you get on the
8	attorney and return the SkyMiles	8	phone, you find the right person,
9	immediately."	9	and you make a few calls. You say,
10	Do you see that?	10	listen, "Mr. De Niro is accusing me
11	A. Yes.	11	of stealing this stuff, I need to
12	Q. And at that point you had	12	get it back."
13	spoken with an attorney, correct?	13	Did you ever try to do
14	A. I had been in contact with	14	that?
15	an attorney.	15	A. No, I didn't try to call
16	Q. And at that point in time	16	where I knew that once you transfer
17	when you got the letter, were you	17	it, you cannot transfer it back.
18	already aware that you couldn't	18	This would have been something a
19	return the SkyMiles or did you learn	19	topic that we spoke about during the
20	that later?	20	transition if it had been finalized.
21	A. When you call to transfer	21	Q. Okay. Did not attempt to
22	the SkyMiles, they gave you it is	22	transfer them back. Okay.
23	like a disclaimer about how when you	23	Are you aware of whether in
24	transfer them, you cannot transfer	24	any of Mr. Pagano's e-mails, he ever
25	them back. It is something that you	25	indicated that there was no way to
			Page 305
1	G. C. ROBINSON	1	G. C. ROBINSON
2	return the SkyMiles? I am talking	2	cash or the Canal petty cash.
3	about the in the e-mail that he	3	Q. I am just talking about
4	is written that you have seen that	4	Canal. When Tom asked you
5	let me be clear, that you sent	5	mentioned that you were in
6	back to me?	6	possession of cash, whatever you
7	A. I have I can't recall.	7	understood that to mean, do you
8	Q. In Tom's letter, he also	8	remember the approximate amount of
9	indicated that he believed you were	9	cash?
10	in possession of cash belonging to	10	A. I don't know what the
11	Canal, isn't that right?	11	approximate amount of those two
12	A. In his letter, he did state	12	petty cashes were.
13	that.	13	Q. And in it, in his letter,
14 15	Q. Okay.	14 15	he asks at the bottom here, right before the bottom of page two, "I
16	And at the time that you	16	1 0
17	received the letter, you were in possession of cash belonging to	17	strongly urge you to mitigate the
18		18	damages that you have caused and return the various computers,
19	Canal, weren't you?  A. Yes.	19	iPhones, cameras, and other property
20		20	in your possession that belongs to
21	Q. How much cash, belonging to Canal, were you in possession of at	21	Canal."
22	the time that you received this	22	Do you see that?
23	letter?	23	A. Yes.
24	A. I can't recall the specific	24	Q. When did you return the
25	amounts in the Toukie Smith petty	25	cash, and how much did you return?
	anicana in me roune omini peny		casii, and non mach and you return.



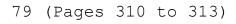


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1 G. C. ROBINSON 2 A. It was returned with the 3 rest of Canal Productions's property 4 that was in my possession, I 5 believe, November 5th of this year. 6 Q. Okay. 7 So Tom asked you to return 8 this in July of 2019, correct? 9 A. I wouldn't 10 Q. Correct? 11 A. I wouldn't 12 Q. It is okay. You can say 13 it. 14 A. I wouldn't put the context 15 of this. 16 Q. Earlier I asked you at 17 the beginning of the deposition, I 18 asked if you understood the oath, 19 and that if some answers that you 20 gave were going to be hurtful to 21 your case, and you agreed to be 22 truthful. 23 I'm asking you now, didn't 24 you hold on to Canal's cash for more 25 than two years before you returned	1 G. C. ROBINSON 2 it, yes or no? 3 A. Yes, but I don't think that 4 is the context of why the I had 5 the possession of the property. 6 MR. DROGIN: I move to 7 strike everything you said 8 after the word "yes." 9 Q. Is there a reason why you 10 returned the cash in November of 11 2021? 12 A. I don't know how to answer 13 that without discussing something 14 that was that was privileged. 15 Q. Okay. 16 So I think we can infer 17 from that that your attorney told 18 you to return the cash, but I can't 19 ask you about that because it is 20 privileged, so that is okay. We 21 will move on. 22 How much cash did you 23 return? 24 A. All of the Canal and Toukie 25 Smith petty cash that I had had. I
1 G. C. ROBINSON 2 don't recall the amount. 3 Q. So when you returned this 4 cash, you don't even know how much 5 you returned? 6 A. Off the top of my head, I 7 can't recall the amount. 8 Q. Can you approximate how 9 much cash you had? 10 A. I don't want to guess. 11 Q. I am not asking you to 12 guess. I am asking you to 13 approximate? 14 A. I don't know the amount. 15 Q. Would it surprise you if it 16 was more than \$10,000? 17 A. I don't believe it was 18 \$10,000, but again, I will state 19 that I do not recall the amount of 20 the petty cash. 21 Q. Now Tom also mentioned to 22 you in his letter that he believed 23 that you were in possession of 24 certain gift cards belonging to Canal.	1 G. C. ROBINSON 2 Do you see that? 3 A. What line is that under or 4 what paragraph? 5 Q. It is in Paragraph 3. It 6 says, "These include food, 7 transportation, such as Uber and 8 taxis, dog sitting, groceries, 9 cameras, iPhones, subscriptions to 10 magazines, and newspapers, Pilates 11 classes, dry cleaning, flowers for 12 your residence, an unknown number of 13 gift cards, and helped yourself to 14 petty cash." 15 I am talking about the gift 16 card part of this. 17 A. Can you repeat your 18 question? 19 Q. At the time that you 20 received that letter, did you, in 21 fact, have gift cards belonging to 22 Canal? 23 A. Yes, I had gift cards. But 24 what the line that you are 25 referring to in the letter is him



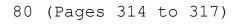


	Page 310		Page 31	1 1
1	_	1	_	
1	G. C. ROBINSON	1	G. C. ROBINSON	
2	making a claim that I had used an	2	asked you to return them in July of	
3	unknown number of gift cards for my	3	2019, isn't that right?	
4	personal expenses.	4	A. Yes. But he was also aware	
5	Q. Right. But I'm not asking	5	that I had items in my possession	
6	that question. I am just asking	6	that were Canal's, and that he was	
7	whether you had Canal gift cards in	7	handling my transition, and in no	
8	your possession at the time that you	8	point did he finalize my transition	
9	received the letter?	9	before he sent this threatening	
10	A. Yes, I had gift cards	10	letter with false allegations in it.	
11	amongst other items here at the	11	MR. DROGIN: Move to	
12	the approved office that I had. My	12	strike everything you said	
13	office was here in my home.	13	after the word yes.	
14	Q. So the answer to my	14	Q. Do you know the dollar	
15	question is yes, you had Canal gift	15	value of the gift cards that you	
16	cards, correct?	16	returned?	
17	A. Okay.	17	A. I am not aware off the top	
18	Q. Did you ever return those	18	of my head what the value of it was.	
19	gift cards?	19	Q. Would it surprise you that	
20	A. They were returned with the	20	based on the ones that we can tell	
21	rest of the Canal items.	21	it was over \$19,000 in gift cards;	
22	Q. So they were returned in	22	would that come as a shock to you?	
23	November of 2021?	23	A. Again, I don't recall the	
24	A. Yes.	24	total amount, but I would take your	
25	Q. And Tom, in his letter,	25	word for it.	
	D 210		D 21	
	Page 312		Page 31	L3
1	G. C. ROBINSON	1	G. C. ROBINSON	L3
2	G. C. ROBINSON Q. But before returning the	2	G. C. ROBINSON to an inventory, and we will	L3
2 3	G. C. ROBINSON	2 3	G. C. ROBINSON	L3
2 3 4	G. C. ROBINSON Q. But before returning the cash, you didn't think to count it, correct?	2 3 4	G. C. ROBINSON to an inventory, and we will comply with the Court's deadline.	L3
2 3 4 5	G. C. ROBINSON Q. But before returning the cash, you didn't think to count it,	2 3 4 5	G. C. ROBINSON to an inventory, and we will comply with the Court's	L3
2 3 4 5 6	G. C. ROBINSON Q. But before returning the cash, you didn't think to count it, correct?	2 3 4 5 6	G. C. ROBINSON to an inventory, and we will comply with the Court's deadline. MR. DROGIN: So we will leave that open. We will	L3
2 3 4 5 6 7	G. C. ROBINSON Q. But before returning the cash, you didn't think to count it, correct? A. I believe that there is	2 3 4 5 6 7	G. C. ROBINSON to an inventory, and we will comply with the Court's deadline. MR. DROGIN: So we will leave that open. We will leave that part of this open.	L3
2 3 4 5 6 7 8	G. C. ROBINSON Q. But before returning the cash, you didn't think to count it, correct? A. I believe that there is documentation somewhere what was returned. Q. Okay.	2 3 4 5 6 7 8	G. C. ROBINSON to an inventory, and we will comply with the Court's deadline. MR. DROGIN: So we will leave that open. We will leave that part of this open. Q. So just so I don't lose my	13
2 3 4 5 6 7 8 9	G. C. ROBINSON Q. But before returning the cash, you didn't think to count it, correct? A. I believe that there is documentation somewhere what was returned. Q. Okay. Is that documentation that	2 3 4 5 6 7 8 9	G. C. ROBINSON to an inventory, and we will comply with the Court's deadline. MR. DROGIN: So we will leave that open. We will leave that part of this open. Q. So just so I don't lose my train of thought, so you didn't	L3
2 3 4 5 6 7 8 9	G. C. ROBINSON Q. But before returning the cash, you didn't think to count it, correct? A. I believe that there is documentation somewhere what was returned. Q. Okay. Is that documentation that you prepared?	2 3 4 5 6 7 8 9	G. C. ROBINSON to an inventory, and we will comply with the Court's deadline. MR. DROGIN: So we will leave that open. We will leave that part of this open. Q. So just so I don't lose my train of thought, so you didn't count up the amount of the gift	L3
2 3 4 5 6 7 8 9 10	G. C. ROBINSON Q. But before returning the cash, you didn't think to count it, correct? A. I believe that there is documentation somewhere what was returned. Q. Okay. Is that documentation that you prepared? MS. HARWIN: Without	2 3 4 5 6 7 8 9 10	G. C. ROBINSON to an inventory, and we will comply with the Court's deadline. MR. DROGIN: So we will leave that open. We will leave that part of this open. Q. So just so I don't lose my train of thought, so you didn't count up the amount of the gift cards that you were returning, is	L3
2 3 4 5 6 7 8 9 10 11	G. C. ROBINSON Q. But before returning the cash, you didn't think to count it, correct? A. I believe that there is documentation somewhere what was returned. Q. Okay. Is that documentation that you prepared? MS. HARWIN: Without disclosing anything that is	2 3 4 5 6 7 8 9 10 11	G. C. ROBINSON to an inventory, and we will comply with the Court's deadline. MR. DROGIN: So we will leave that open. We will leave that part of this open. Q. So just so I don't lose my train of thought, so you didn't count up the amount of the gift cards that you were returning, is that right?	L3
2 3 4 5 6 7 8 9 10 11 12 13	G. C. ROBINSON Q. But before returning the cash, you didn't think to count it, correct? A. I believe that there is documentation somewhere what was returned. Q. Okay. Is that documentation that you prepared? MS. HARWIN: Without disclosing anything that is attorney-client privilege.	2 3 4 5 6 7 8 9 10 11 12 13	G. C. ROBINSON to an inventory, and we will comply with the Court's deadline. MR. DROGIN: So we will leave that open. We will leave that part of this open. Q. So just so I don't lose my train of thought, so you didn't count up the amount of the gift cards that you were returning, is that right? A. I can't recall the amount	L3
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	G. C. ROBINSON Q. But before returning the cash, you didn't think to count it, correct? A. I believe that there is documentation somewhere what was returned. Q. Okay. Is that documentation that you prepared? MS. HARWIN: Without disclosing anything that is attorney-client privilege. Obviously you are not to disclose any attorney-client privileged communications.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	G. C. ROBINSON to an inventory, and we will comply with the Court's deadline. MR. DROGIN: So we will leave that open. We will leave that part of this open. Q. So just so I don't lose my train of thought, so you didn't count up the amount of the gift cards that you were returning, is that right? A. I can't recall the amount of the gift cards that were returned. Q. I know that. And that is	13
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	G. C. ROBINSON Q. But before returning the cash, you didn't think to count it, correct? A. I believe that there is documentation somewhere what was returned. Q. Okay. Is that documentation that you prepared? MS. HARWIN: Without disclosing anything that is attorney-client privilege. Obviously you are not to disclose any attorney-client privileged communications. MR. DROGIN: We can specifically ask her whether there was inventory. So if there was an inventory prepared by the witness, I think we are entitled to it.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	G. C. ROBINSON to an inventory, and we will comply with the Court's deadline. MR. DROGIN: So we will leave that open. We will leave that part of this open. Q. So just so I don't lose my train of thought, so you didn't count up the amount of the gift cards that you were returning, is that right? A. I can't recall the amount of the gift cards that were returned. Q. I know that. And that is because you didn't count them, isn't that right? A. No, I would not say that is correct. But again Q. If you counted them, then you would know, right? If you	13
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	G. C. ROBINSON Q. But before returning the cash, you didn't think to count it, correct? A. I believe that there is documentation somewhere what was returned. Q. Okay. Is that documentation that you prepared? MS. HARWIN: Without disclosing anything that is attorney-client privilege. Obviously you are not to disclose any attorney-client privileged communications. MR. DROGIN: We can specifically ask her whether there was inventory. So if there was an inventory prepared by the witness, I think we are entitled to it. MS. HARWIN: Counsel, you	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	G. C. ROBINSON to an inventory, and we will comply with the Court's deadline. MR. DROGIN: So we will leave that open. We will leave that part of this open. Q. So just so I don't lose my train of thought, so you didn't count up the amount of the gift cards that you were returning, is that right? A. I can't recall the amount of the gift cards that were returned. Q. I know that. And that is because you didn't count them, isn't that right? A. No, I would not say that is correct. But again Q. If you counted them, then you would know, right? If you counted the gift cards, then you	13
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	G. C. ROBINSON Q. But before returning the cash, you didn't think to count it, correct? A. I believe that there is documentation somewhere what was returned. Q. Okay. Is that documentation that you prepared? MS. HARWIN: Without disclosing anything that is attorney-client privilege. Obviously you are not to disclose any attorney-client privileged communications. MR. DROGIN: We can specifically ask her whether there was inventory. So if there was an inventory prepared by the witness, I think we are entitled to it. MS. HARWIN: Counsel, you know there was a deadline on	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	G. C. ROBINSON to an inventory, and we will comply with the Court's deadline.  MR. DROGIN: So we will leave that open. We will leave that part of this open. Q. So just so I don't lose my train of thought, so you didn't count up the amount of the gift cards that you were returning, is that right?  A. I can't recall the amount of the gift cards that were returned. Q. I know that. And that is because you didn't count them, isn't that right?  A. No, I would not say that is correct. But again Q. If you counted them, then you would know, right? If you counted the gift cards, then you would know the value of the gift	13
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	G. C. ROBINSON Q. But before returning the cash, you didn't think to count it, correct? A. I believe that there is documentation somewhere what was returned. Q. Okay. Is that documentation that you prepared? MS. HARWIN: Without disclosing anything that is attorney-client privilege. Obviously you are not to disclose any attorney-client privileged communications. MR. DROGIN: We can specifically ask her whether there was inventory. So if there was an inventory prepared by the witness, I think we are entitled to it. MS. HARWIN: Counsel, you	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	G. C. ROBINSON to an inventory, and we will comply with the Court's deadline. MR. DROGIN: So we will leave that open. We will leave that part of this open. Q. So just so I don't lose my train of thought, so you didn't count up the amount of the gift cards that you were returning, is that right? A. I can't recall the amount of the gift cards that were returned. Q. I know that. And that is because you didn't count them, isn't that right? A. No, I would not say that is correct. But again Q. If you counted them, then you would know, right? If you counted the gift cards, then you	13



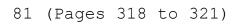


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1		1	G. C. ROBINSON
1	G. C. ROBINSON	1	
2	A. (No verbal response.)	2	where you have an employer's
3	Q. Correct? I am not trying	3	property and they ask for it back
4	to trick you here. I know the	4	and you don't return it. The
5	answer is obvious, but it is not a	5	employer can say, "What about the
6	trick question.	6	rest of the property? You stole the
7	A. I don't know the total	7	rest of the property. You gave me
8	amount of the gift cards off the top	8	back this, but you didn't give me
9	of my head.	9	that back." They could have
10	Q. So just to go back to this	10	conjured up that claim, right?
11	theory that you were concerned	11	A. I can't speculate on a
12	about, that Canal was conjuring up	12	hypothetical on something that has
13	claims against you, so had you	13	is not something in front of me
14	returned the cash, when it was	14	with this with what Canal
15	requested, Canal could have said,	15	Productions had done.
16	"Hey, wait, where is the rest of the	16	Q. Do you remember having a
17	cash? This is only \$5,000, and we	17	conversation with Robin Chambers
18	think you have more." They could	18	about the property that you had
19	have made up a fake claim like that,	19	retained?
20	right?	20	A. I can't recall a specific
21	A. I can't speculate on	21	conversation. We have had many
22	something unless you give me an	22	conversations over the years and
23	example of it or on just what could	23	during that period of time.
24	have	24	Q. Did Robin Chambers ever
25	Q. Let's take as an example	25	tell you in one of those phone
	Page 316		Page 317
1	G. C. ROBINSON	1	G. C. ROBINSON
2	calls, "I think you should give it	2	returned camera equipment, is that
3	back?"	3	correct?
4	A. No, I can't recall that	4	A. Yes.
5	that that was discussed or that she	5	Q. Is that camera equipment
6	said that. But, again, we had many	6	that belonged to Canal?
7	conversations over that period of	7	A. Yes.
8	time. In the during that time I	8	Q. Okay.
9	was in transition and speaking to	9	Where was this stuff all
10	Tom Harvey about it. E-mails went	10	kept together, like the gift cards,
11	to Bob about the transition that it	11	the cash, camera equipment, was this
12	would take me a while to put things	12	all kept in one place?
13	together. I had never finalized	13	A. During Canal they were kept
14	anything with Tom Harvey, and then I	14	at my office for Canal, which was
15	was sent this threatening letter	15	approved to be my home.
16	with false allegations.	16	Q. Okay.
17	Q. Right. I got that.	17	So they were at home with
18	So you resigned on April	18	you. And did they stay there until
19	6th, and July 11th you are asked to	19	they were returned, or did they go
20	return the property, and you	20	somewhere else in between?
21	returned it in November, two years	21	A. I preserved the items here.
22	later, is that factually correct?	22	They were here.
23	A. Yes, but without context.	23	Q. So when they were shipped
24	Q. Okay. Camera equipment.	24	back to Canal, they were shipped
	On November 5th, 2021, you	25	from your home?
25	On November Jul. 2021. vou	23	Hom your home;



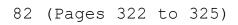


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1	G. C. ROBINSON	1	G. C. ROBINSON
1 2		1	
	A. They went from my home to	2	transition, and then I was sent this
3	Greg's office.	3	threatening, false letter.
4	Q. Okay.	4	Q. Well, actually, after this
5	So a trucking company came,	5	letter, that you are characterizing
6	physically picked up the items, and	6	as threatening and false, actually a
7	delivered them to Mr. Bennett's	7	lawsuit was started against you.
8	office?	8	Isn't that right?
9	A. I'm sorry. Can you just	9	A. A retaliatory lawsuit was
10	repeat	10	started against me.
11	Q. I am trying to figure out	11	Q. Well, retaliatory is not
12	the chain of custody, whether this	12	that is a conclusion. At the
13	ever went through your attorneys, or	13	moment, let's just call it the
14	it simply left your apartment and	14	lawsuit and not put labels on it. I
15	went to Mr. Bennett's firm?	15	won't call you a thief, even though
16	A. It went from my apartment	16	I think you stole. I will give you
17	to Mr. Bennett's firm.	17	the respect of, you know, just
18	Q. Did you the camera	18	keeping it at arm's length.
19	equipment that you had, why didn't	19	MS. HARWIN: Counsel,
20	you return it sooner?	20	that is inappropriate.
21	A. As I stated, I was in	21	MR. DROGIN: What is
22	transition with Tom Harvey regarding	22	inappropriate?
23	all of this stuff. After I resigned	23	MS. HARWIN: Just ask
24	I had not heard back from Tom Harvey	24	your question.
25	about finalizing any of the	25	MR. DROGIN: I am. I am
	Page 320		Page 321
1	G. C. ROBINSON	1	G. C. ROBINSON
2	trying to. I just don't	2	Canal's property?
3	appreciate statements being	3	A. Again, it would go to
4	added onto very simple	4	privileged conversation that I had
5	questions.	5	with my attorneys.
6	Q. The question was, wasn't	6	Q. Wow. You know, there is a
7	the lawsuit started?	7	crime fraud exception to the
8	A. Canal filed a lawsuit on	8	attorney-client privilege? And this
9	August 17th, Bob's birthday, 2019.	9	could be construed as stolen
10	Q. In other words, the answer	10	property. If you are going to tell
11	to my question is yes?	11	me that your attorney counseled you
12	A. I have stated that, I	12	to retain property that didn't
13	believe, twice now.	13	belong to you, we are going to have
14	Q. So at that point would you	14	to leave that open. We will move
15	say that your communications in this	15	on.
	say that your communications in this		
16		16	MS. HARWIN: Counselor,
16 17	winding down with Tom Harvey had come to a conclusion?	16 17	MS. HARWIN: Counselor, the speeches are wildly
	winding down with Tom Harvey had		the speeches are wildly
17	winding down with Tom Harvey had come to a conclusion?	17	
17 18	winding down with Tom Harvey had come to a conclusion?  A. Yes.  Q. But still, when the lawsuit	17 18	the speeches are wildly inappropriate.
17 18 19	winding down with Tom Harvey had come to a conclusion?  A. Yes.  Q. But still, when the lawsuit was filed in 2019, you still didn't	17 18 19	the speeches are wildly inappropriate.  MR. DROGIN: I think they
17 18 19 20	winding down with Tom Harvey had come to a conclusion?  A. Yes.  Q. But still, when the lawsuit was filed in 2019, you still didn't return all of this loot. Why not?	17 18 19 20	the speeches are wildly inappropriate.  MR. DROGIN: I think they   (Simultaneous speaking)
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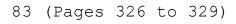


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	Page 322		Page 323
G. C. ROBINSON  MS. HARWIN: Before w begin, I want to note for the record that a lot of the questioning has been filled with speeches, attacks, interruption, and intimidation tactics. We object to that, and we will object to the continuation of the deposition if you continue to fill your time with that.  MR. DROGIN: Okay. D that mean that if I don't, you will consent to the continuation of the deposition, or are you going to object anyway?  MS. HARWIN: We will s where you end today. MR. DROGIN: I am goin to probably ask three more	oes	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	G. C. ROBINSON Q. Ms. Robinson, after you received the letter from Tom Harvey, on July 11, did you speak with Mr. Harvey at any time before Canal started its lawsuit against you? A. I don't believe I did. Q. Back in November, one of the items that you returned to Canal was on iPhone, is that correct? A. Yes. Q. Did you ever access that iPhone on or after April 6th, 2019? A. Yes. Q. When, and for what purpose? And if when is many times, then just tell me what purpose. A. I recall accessing it to make sure that when giving it to the tech vendor that they were going to give us a correct phone and the password was correct. That I was
23 MR. DROGIN: 1 am goin	ıg	23	given the correct information.
24 questions, and ask them		24	Q. Anything else that you did
25 really politely.		25	on that phone?
G. C. ROBINSON  A. Not that I recall during that that time.  Q. And same question regar an external hard drive that you returned. Did you access that external hard drive after you resigned?  A. I can't recall except for when handing the stuff over to tech vendor, making sure there no password on the phone. I can't recall accessing it.  Q. On the iPhone, what was mailboxes were there?  A. The I can't recall. It is a clone copy of Bob's phone he gave me for the work on the divorce. I don't know. I believ his his e-mail, but I don't know what other mailbox inboxes were.	the was an't that that	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	G. C. ROBINSON iPhone.  Q. So the iPhone that you had was a clone of his. It was was it one that you used?  A. It was one that was given to me to take the information and give it to had been been been been been been been bee
Q. So you are saying, physically, the phone was his?		23 24	And what about text accounts, were there any accounts
25 A. It was a clone copy of his	S	25	there, other than Bob's, I guess



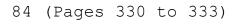


	Page 326			Page	327
1	G. C. ROBINSON	1	G. C. ROBINSON		
2	that assumes the fact that you have	2	record, do you have a		
3	were Bob's text accounts on that	3	position on that?		
4	phone?	4	MS. HARWIN: I believe		
5	A. I can't recall off the top	5	that, you know, counsel		
6	of my head, other than that it was a	6			
7		7	should finish the questioning		
8	clone copy of Bob's phone. So	8	today and use its time, and		
9	whatever was on his phone and I I believe it was his texts. But I	9	then, you know, if there are		
10	don't know if there was other	10	any questions that you		
11		11	contend have been prevented		
12	Q. Okay. Thank you.	12	from asking, you know, we		
13	MR. DROGIN: Hopefully my	13	will meet and confer with you		
	behavior during the last	14	about that.		
14	three minutes did not offend		MR. DROGIN: I think that		
15	or intimidate anyone. Can we	15	the point that we are making,		
16	talk about how we want to	16	and I think the point that		
17	proceed? Because this is a	17	the judge understood, was		
18	logical breaking point. I	18	that it was going to be		
19	know we have some additional	19	impossible to finish in one		
20	time left today. There are a	20	day. The question is		
21	couple of open issues. We	21	whether, now, at 6:00 p.m.,		
22	have had conversations with	22	everybody wants to push on		
23	the judge about additional	23	for another 45 minutes on the		
24	time. Do you want to discuss	24	record, and then have a		
25	that on the record, off the	25	discussion about a second day		
	Page 328			Page	329
1	_	1	G C RORINSON	Page	329
1 2	G. C. ROBINSON	1 2	G. C. ROBINSON	Page	329
2	G. C. ROBINSON or whether we want to pause	2	remaining, and then we will	Page	329
2 3	G. C. ROBINSON or whether we want to pause here, at 6:00, and then have	2 3	remaining, and then we will attempt to meet and confer to	Page	329
2 3 4	G. C. ROBINSON or whether we want to pause here, at 6:00, and then have that discussion? I am not	2 3 4	remaining, and then we will attempt to meet and confer to determine how much additional	Page	329
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	Page 330		Pa	age 331
1	G. C. ROBINSON	1	G. C. ROBINSON	
2	requests review of her	2	circulated to you to your	
3	deposition transcript. We	3	client as of yet?	
4		4	MS. HARWIN: Let me	
	will reserve signature	5	check. I don't recall. Can	
5 6	following the review of her	6		
7	deposition. And I will also	7	you tell me which exhibit	
	note pursuant to Paragraph 1	1	number that was?	
8	of the Protective Order in	8	MR. BENNETT: 6478.	
9	this case that we will advise	9	MS. HARWIN: I don't	
10	counsel on the record that	10	believe I did. There was	
11	within 30 days after the	11	only it was Exhibits A, B,	
12	completion of Plaintiff's	12	and C. The ones that we went	
13	deposition as to the	13	on the record with were the	
14	confidentiality designation.	14	ones that were sent to Ms.	
15	And I just remind everyone	15	Robinson.	
16	that during the 30-day period	16	MR. BENNETT: Okay. I	
17	following this deposition,	17	would just ask that you hold	
18	the entirety of the	18	onto it.	
19	deposition transcript is to	19	MS. HARWIN: That's fine.	
20	be treated as confidential.	20	MR. DROGIN: For	
21	MR. BENNETT: Before we	21	clarification, I am prepared	
22	go off the record, if you	22	to move on and do the	
23	have not I guess I am	23	additional 40 minutes. I	
24	going to ask, have you sent	24	really thought it was just	
25	the one exhibit that I	25	for the convenience of the	
	D 222			
	Page 332			age 333
1	G. C. ROBINSON	1	G. C. ROBINSON	age 333
2	G. C. ROBINSON parties. I thought we were	2		age 333
	G. C. ROBINSON	2 3	G. C. ROBINSON your position, then I don't want to stop.	age 333
2 3 4	G. C. ROBINSON parties. I thought we were	2 3 4	G. C. ROBINSON your position, then I don't	age 333
2 3 4 5	G. C. ROBINSON parties. I thought we were agreeing to this. I didn't	2 3 4 5	G. C. ROBINSON your position, then I don't want to stop.	age 333
2 3 4 5 6	G. C. ROBINSON parties. I thought we were agreeing to this. I didn't I am not formally requesting it. I just thought it was good for	2 3 4 5 6	G. C. ROBINSON your position, then I don't want to stop. MS. HARWIN: I think we will consider that 40 minutes, as well as your	age 333
2 3 4 5 6 7	G. C. ROBINSON parties. I thought we were agreeing to this. I didn't I am not formally requesting it. I just	2 3 4 5	G. C. ROBINSON your position, then I don't want to stop. MS. HARWIN: I think we will consider that 40	age 333
2 3 4 5 6 7 8	G. C. ROBINSON parties. I thought we were agreeing to this. I didn't I am not formally requesting it. I just thought it was good for everybody, and everybody was in agreement on that. I am	2 3 4 5 6 7 8	G. C. ROBINSON your position, then I don't want to stop. MS. HARWIN: I think we will consider that 40 minutes, as well as your	age 333
2 3 4 5 6 7 8 9	G. C. ROBINSON parties. I thought we were agreeing to this. I didn't I am not formally requesting it. I just thought it was good for everybody, and everybody was in agreement on that. I am not looking to make	2 3 4 5 6 7 8 9	G. C. ROBINSON your position, then I don't want to stop. MS. HARWIN: I think we will consider that 40 minutes, as well as your request for additional time. I understand that you are seeking more time beyond the	age 333
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1 G. C. ROBINSON 2 Is that your understanding, 3 or are you going to oppose 4 that as well? 5 MS. HARWIN: We will 6 agree to reconvene for 40 7 minutes if the Court allows 8 additional time. 9 (Continued on next page 10 to accommodate jurat.) 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	1 G. C. ROBINSON 2 MR. DROGIN: That is all 3 I was asking. 4 MR. BENNETT: Requesting 5 a rough transcript. 6 MR. DROGIN: Requesting a 7 copy of the transcript and a 8 rough transcript. 9 MS. HARWIN: Requesting a 10 copy of the transcript. 11 12 (Time Noted: 6:11 p.m.) 13 14 GRAHAM CHASE ROBINSON 15 16 Subscribed and sworn to 17 before me this day of 18 2021. 19 20 21 Notary Public
Page 336  I INDEX  INDEX  WITNESS EXAMINATION BY PAGE  Graham Chase Robinson Mr. Drogin 4  Mr. Bennett 109  Mr. Drogin 256  EXHIBITS  ROBINSON DESCRIPTION PAGE A a three-page PDF 156 document that was filed in the New York State Action as document number  B a seven-page PDF 163 starting with Bates stamped Robinson 5114 C a 20-page PDF, 180 file name P13908  D a Tom Harvey 270 letter, from July 11, 2019	1 CERTIFICATE 2 I, PAIGE HAYDEN, hereby certify that the 4 Examination Before Trial of GRAHAM CHASE ROBINSON was 5 held before me on the 20th day of December, 2021; that 6 said witness was duly sworn before the commencement of 7 her testimony; that the testimony was taken 8 stenographically by myself and then transcribed by 9 myself; that the party was represented by counsel as 10 appears herein; 11 That the within transcript is a true record of 12 the Examination Before Trial of said witness; 13 That I am not connected by blood or marriage 14 to any of the parties; that I am not interested directly 15 or indirectly in the outcome of this matter; that I am 16 not in the employ of any of the counsel. 17 IN WITNESS WHEREOF, I have hereunto set my 18 hand this 20th day of December, 2021. 19 20 21 PAIGE HAYDEN 22 23 24 25

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17 GRAHAM CHASE ROBINSON	
SUBSCRIBED AND SWORN TO BEFORE ME	
19 THIS DAY OF, 20	
21 (NOTARY PUBLIC) MY COMMISSION EXPIRES:	
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